

Howatt Robert (DOS)

From: John Austin [austin4102000@yahoo.com]
Sent: Thursday, March 29, 2007 3:22 PM
To: Howatt Robert (DOS); sara smith; Rachel Swick; Gary Simpson; Cherry Philip J. (DNREC); Nickerson Karen J (DOS); Larson Russell T (LegHall); Smisson Charlie T. (DNREC); Davis Jennifer (OMB); Bill ZAK
Subject: NRG Unredacted Form H

The PSC has recently posted the unredacted NRG form H.

http://dep.sc.delaware.gov/electric/irp/nrg_formh0329.pdf

With this information and the heat inputs of the existing units from EPA's Database, one can make reasonable calculations of the yearly emissions of the proposed 630MW gross heat input IGCC.

One of the many facts that has come to light in the bid review process is that the net output of the IGCC unit would be just 400MW. Where does the other 230MW go? The bid explains that 50MW would be needed to run the compressors for CO2 sequestration. The rest would be consumed to make the syn-gas and power the gas separation units to isolate the hydrogen sulfide from the hydrogen rich syn-gas before it is burned. This is not an efficient use of natural resources. The coal of a 630MW unit is need to get 400MW of output. Even if sequestration at 65% were possible the CO2 emissions of a 220.5 MW unit would go uncontrolled. IGCC units have not turned out to be the better alternative they have been touted to be. IGCC is just a way to mine and burn coal faster.

There is also another problem revealed with this data. Units 1 & 2 have but 10.5 pounds of mercury emission allocation to transfer to a new unit. There is no more. The unit would have to be reduced in size or increase mercury removal if it were to be permitted.

As in my comments of 3/22, I conclude the the NRG bid is not in conformance with the Coastal Zone Act and should be removed from further consideration.

	80%	100%Capacity
SO2	460	574Tons
NOx	398	498Tons
CO2	3078790	3848488Tons
CO	214	268Tons
VOC	31	38Tons
PM10	199	249Tons
PM2.5	199	249Tons
Lead	TBD	TBD Tons
Mercury	15.62	19.53Pounds

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Howatt Robert (DOS)

From: dominique baron [dominique@delawarenaturesociety.org]
Sent: Thursday, March 29, 2007 3:52 PM
To: Howatt Robert (DOS)
Cc: Nickerson Karen J (DOS)
Subject: Delaware Nature Society Comments on Evaluation Reports
Attachments: Dominique Baron (Dominique Baron).vcf; DNS Comments on Evaluation Reports 0307.pdf

Bob & Karen,

Please accept the attached document as official comments from the Delaware Nature Society on the Consultants' Evaluation Reports and distribute and post as necessary. I have addressed the attached memo to the PSC Commissioners and Secretary Hughes, I hope this covers all the folks that should receive the memo, however, if there are others, please be sure to include them in the distribution. If you have any questions about the attachment please call me on my cell at 302-743-5419 as I am currently out of town at meetings and not checking email regularly.

Thank you for the opportunity to comment,
 Dorninique

Ms. Dominique M. Baron

Environmental Advocate
 Delaware Nature Society, Ashland Nature Center
 PO Box 700; Hockessin, DE 19707
 3511 Barley Mill Road; Hockessin, DE 19707
 tel. 302.239.2334 x132; fax 302.239.2473
 Dominique@delawarenaturesociety.org
 www.delawarenaturesociety.org

From: Howatt Robert (DOS) [mailto:robert.howatt@state.de.us]
Sent: Thursday, March 29, 2007 10:30 AM
To: Aaron Nathans; Greg Burton; Jeff Montgomery; Jon Hurdle; Steven Daily; Alan Muller; Barry Sheingold; Bill Moore; Bill Wimperis; Bonar David (DOS); Bradley M. Campbell; Bunting George (LegHall); Burcat Bruce H (DOS); Carol F. Taylor; Caroline Angoorly; Chad Tolman; Cherry Philip J. (DNREC); Chris Maccracken; Christine Agugliaro; Citrolo John (DOS); Cohan Jennifer (LegHall); Dillard Janis L (DOS); Dominique Baron; dominique baron; Doug Pfeister; Dr. Constance Peterson; Elliot Roseman; Gary Ferenz; Gary Stockbridge; George Owens; Howatt Robert (DOS); James J. Demarest, Jr.; James McC. Geddes; Jans Gsnase; Jeremy Firestone; Joann T. Conaway; John Flaherty; John Kowalko; Joy Sikora; Judah Rose; Kim Furtado; Lex Grier; Lezael Haynes; Louis Monacell; Maria Scheller; Mark FinFrock; Marlene Rayner; McRae Arnetta (DOS); Michael Houghten; O'Brien William (DOS); Padmore Arthur (DOS); Ray Long; Rob Propes; Robert Reuter; Sallie & Steve Callanen; Sally Buttner; Scoglietti Robert (OMB); Shannon Sugrue; Sheehy Michael (DOS); Smisson Charlie T. (DNREC); Thomas P. McGonigle; Willett Kempton; William F. Zak (CCP); Anthony J. Kamerick; Anthony Wilson; Dr. Paul E. Sample; Gerry Hopper; Jonathan Guy; Katherine.Kennedy; Letty Diswood; Lisa Pertzoff; Peter Mandelstam; Tom Krizmanich; Tom Shaw; Wayne Oliver
Subject: Additional Posting

Please be advised that RFP Response Form H, for each bidder has been posted to the PSC website. In addition we anticipate revised redacted filings from each bidder by Monday, April 2, 2007 and will post them as they are available.

3/29/2007

Bob Howatt
Delaware Public Service Commission
(302) 739-7099

**ASHLAND
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www.delawarenaturesociety.org

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VIA EMAIL: robert.howatt@state.de.us; karen.nickerson@state.de.us

TO: Ms. Arnetta McRae, Chair
Commissioners, Public Service Commission

Secretary John Hughes
Department of Natural Resources and Environmental Control

FROM: Ms. Dominique Baron, Environmental Advocate

DATE: March 29, 2007

SUBJECT: Comments on Evaluation of Power Generation Bids

The Delaware Nature Society (DNS) is a private, non-profit, membership organization with more than 8,000 members statewide that works to foster understanding, appreciation, and enjoyment of the natural world through education, advocacy and preservation. The organization has been studying "energy issues" broadly for many years and has assessed the recent Request for Proposals (RFP) for long term power generation in Delaware. Our analysis has focused on the three competing proposals and the bid evaluation reports submitted by consultants for Delmarva Power and the involved state agencies. The competing bids propose construction of power generation facilities in Delaware powered by natural gas (Natural Gas proposal), offshore wind turbines (Offshore Wind Energy proposal) or an integrated gasification combined cycle coal plant integrated with carbon dioxide capture and sequestration (IGCC/CCS proposal).

Energy efficiency and conservation should be the primary means by which policymakers and energy providers seek to respond to a growing gap in energy supply versus demand. Efficiency and conservation are the fastest and lowest cost routes to balancing supply and demand and reducing the impact of energy consumption on the environment. This option unfortunately was not offered as part of the bid selection process, but must be an integral part of Delaware's long-term energy policy. After comparing the environmental impacts of the three proposals, the Delaware Nature Society has concluded that the Offshore Wind Energy proposal is the most prudent choice for Delaware.

Environmental Considerations

Climate change is threatening our coastlines, wildlife and climate. Human activities have tended to warm the earth in several ways – through land use changes and by increasing amounts of soot and greenhouse gases being emitted into our atmosphere. Carbon dioxide produced by the burning of fossil fuels is the primary greenhouse gas responsible for climate change and the negative environmental impacts. The Delaware Nature Society believes it is important that steps be taken to reduce the human contribution to global warming and advocates the gradual replacement of fossil fuels by alternative energy sources, that are less environmentally damaging per unit of energy than traditional power generation sources. Reducing emissions of greenhouse gases from electricity generation will have a significant impact on the levels of total greenhouse gases emitted to the atmosphere from all man-made sources.

Wind energy does not generate any greenhouse gas emissions during electricity production. Most wind farms offset the greenhouse gas emissions created during their construction and installation in less than one year. During power generation there are no pollutants released, no solid waste generated, no water consumption or discharge, and minimal wildlife and land impacts if the wind farms are properly sited. The Delaware Nature Society believes that the benefits of wind power far outweigh the costs or challenges of this technology.

Proper siting and environmental monitoring can and must be carefully carried out for any new electricity generating facility. Continuous funding streams must be provided by either the owner/operator of the electricity generating facility or by the consumer of the power. Throughout the life of any facility, there must be careful monitoring, assessment and research to evaluate the environmental impacts and costs to wildlife and ecosystem health caused by the operation of the facility. For the Offshore Wind Energy proposal, baseline studies of marine, avian and bat populations on and around the proposed site must be completed before the installation of turbines, and these installations must be monitored for years thereafter.¹ If the baseline studies or ongoing monitoring demonstrate unacceptable environmental impacts, the project must be suspended, revised, or re-evaluated. Similar baseline environmental studies are at least equally important in the case of coal-based energy generation because of the lengthy list of hazardous chemicals released to the air, land and water, the hazardous chemicals in solid waste, and the large cooling water intake and disposal requirements.

¹ "If these conditions (vigorous monitoring and mitigation) are adopted, and remaining significant data gaps are filled with a finding of no significant threat to living resources, Mass Audubon will support this Cape Wind project, the largest, clean, renewable-energy project in the Northeast."

Mass Audubon. "Mass Audubon's position on the Cape Wind Project." March 28, 2006.
[<http://www.massaudubon.org/news/index.php?id=317&type=news>].

Assessment of the RFP and Evaluation Reports

Like the consultants, the Delaware Nature Society rated the Wind Energy proposal as the clearly preferred option based on environmental impacts. However, we believe that the evaluation process set forth in the RFP was inherently flawed, which also affected the consultants' reports. The RFP did not adequately follow the intent of House Bill 6, the legislation prompting the RFP process. That legislation required favoring proposals which (a) complied with the state passed Renewable Portfolio Standard (RPS), (b) promoted conservation over consumption and (c) would not negatively impact land use policy in the state. A more proper assessment would score the Offshore Wind Energy proposal even higher.

Numerous redactions in each of the bids hindered attempts to review all of the information necessary to complete an objective and informed analysis. However, there is considerable information available from other external studies, analyses and evaluations. The Delaware Nature Society's assessment of the likelihood that each proposal can meet its advertised technical goals is as follows:

- **Natural Gas**: mature technology, well demonstrated commercially - will meet its advertised goals in Delaware.
- **Offshore Wind Energy**: newer technology, well demonstrated in Europe - likely will meet its advertised goals in Delaware.
- **IGCC/CCS**: a mix of integrated technologies, not demonstrated on a commercial scale (two of the three described technologies, carbon capture at the required scale and sequestration, are unproven technically)² – unlikely to currently meet its advertised goals in Delaware.

Comments on Specific Environmental Factors

The evaluation reports prepared by Delmarva Power and the consulting team for the state agencies were generally consistent in their ranking of the environmental impacts of each of the three proposals. However, it is important to recognize a discrepancy between the reports:

- The evaluation report compiled by the state agencies' consulting team provided an environmental score for IGCC technology both with and without carbon capture and sequestration while the Delmarva report provided only one score for IGCC (it is unclear if this score considered carbon capture and sequestration).

² "[N]either IGACC nor other coal technologies have been demonstrated with CCS." (Page xiii). *NOTE: IGACC is Integrated Gasification with Carbon Capture.*

"There is no operational experience with carbon capture from coal plants and certainly not with an integrated sequestration operation." (Page xiii).

"[T]he demonstration of an integrated coal conversion, CO₂ capture, and sequestration capability is an enormous system engineering and integration challenge." (Page 100).

Ansulabehere, Stephen et al. "The Future of Coal: Options for a Carbon Constrained World." Massachusetts Institute of Technology. March 2007 [<http://web.mit.edu/coal/>]

- Greenhouse Gas and Critical Pollutant Emissions – The Delaware Nature Society has substantial concerns regarding the evaluation provided by the state agencies' consultant as it related to the IGCC technology. The sequestration operation has not been convincingly demonstrated and therefore is technically risky. We feel the scoring of this category for the IGCC technology was significantly higher than it should be.
- Water Impacts – The evaluation reports were generally consistent for this category and overall the Delaware Nature Society was satisfied with the point allocation.
- Land Impacts – The Delaware Nature Society is supportive of the reuse of brownfield/industrial sites and believes the evaluation reports appropriately allocated the maximum points to the natural gas proposal in this regard. There were however significant differences between the two evaluation reports related to the land impacts of the IGCC and Offshore Wind Energy proposals.
 - *IGCC proposal* – The report prepared by the state agencies' consultant cited that the plant would be "sited on a portion of a parcel of land that is zoned for industrial use" while Delmarva Power's report indicated that the "proposed site is neither a brownfield site nor an industrial site. Under the Sussex County Land Use Plan, the proposed site is currently located in an overlay zone identified as an environmentally sensitive developing area and will require rezoning." Further, Delmarva Power's evaluation report stated that the vast majority of the 70-acre parcel proposed for the IGCC site is described as a typical eastern pine and hardwood forest, which also currently buffers the existing plant from adjacent agricultural uses. If the IGCC site is constructed, the buffer would be lost and at least a portion of the forested land would be cleared.
 - *Offshore Wind Energy proposal* – This proposal does not utilize an existing brownfield/industrial site and each of the reports appropriately reflected this in the point allocation. The evaluation reports differed significantly in interpretation of the land impacts (actual surface area occupied by the structures that support the turbines vs. geographic extent of the proposed project).
- Wildlife Impacts – In reference to the natural gas proposal, the evaluation reports were generally consistent for this category and overall the Delaware Nature Society was satisfied with the point allocation. We do have concerns with the evaluation reports related to the wildlife impacts of the Offshore Wind Energy and IGCC proposals:
 - *Offshore Wind Energy proposal* – Proper siting is essential in order to limit impacts on wildlife of offshore wind farms and ongoing monitoring of the site will be critical. However, despite these concerns, the points allocated by the consultants to the wind energy

proposal were insufficient and too low. The construction of an offshore wind facility may temporarily disrupt the immediate marine environment and may have minimal impacts on nearby commercial/recreational fishing, but there is no evidence to suggest that these impacts will be long-term. Furthermore, the wind power structures will enhance marine ecosystems by creating artificial reefs.

- *IGCC proposal* – As mentioned previously, the Delaware Nature Society is concerned with the impacts of forest and buffer clearing associated with this proposal. Additionally, on a larger scale, the wildlife impacts of climate change (caused by excessive greenhouse gas emissions) are widely recognized. Moreover, the evaluation by the consultant for the state agencies is unclear as to why a determination was made that increased negative wildlife impacts would result from an IGCC facility with carbon capture and sequestration versus a facility without application of these technologies.
- Waste Disposal Impacts – The evaluation reports were generally consistent in this category and overall the Delaware Nature Society was satisfied with the point allocation.

The decision to construct a new power generation facility in Delaware will have significant long-term impacts on our state's environment. It is in keeping with this concern that the Delaware Nature Society first supports conservation and efficiency measures to meet growing energy demand and secondly supports the proposal for Offshore Wind Energy.

Thank you for the opportunity to comment.

RECEIVED
07 MAR 22 PM 12:26
DELAWARE P.S.C.

6 Blue Heron Drive
Lewes, DE 19958
March 21, 2007

Ms. Arnetta McRae, Commission Chair
Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Dear Commissioner McRae:

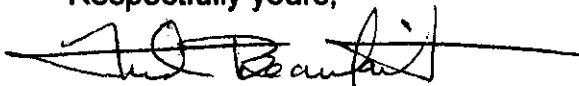
I am writing to urge you and the other Commissioners to give renewed consideration to the Bluewater Wind proposal for the establishment of an off-shore wind farm.

At a time when pollution is destroying our environment, the supplies of fossil fuels are dwindling, and Sussex County is confronted with serious air pollution, it is irresponsible for Delaware to be investing in a new energy plant that will only contribute to the pollution of our air. Believe me when I say that I am not a "card carrying" member of Green Peace and I am not out on the street protesting in the name of "protecting our environment." But I am troubled when I see our State ignoring our significant environment problems and allowing corporate self-interest govern its decisions.

It troubles me greatly when I hear the opponents of the wind turbine farm putting up the feeble argument that these wind turbines will destroy the vista of the sea shore. That argument does not even rate a second's worth of consideration it is so shallow and self-serving. I, for one, find the wind turbines an exciting site.

None of three proposals for future power in Delaware are perfect solutions to our future source of energy, but I believe it is time for us to invest in clean sources of energy. Let me suggest that perhaps a combination of the wind farm and the natural gas plant would be the responsible way to go. I suggest this only to provide some backup to the wind farm at the times when the wind fails us. Since it does not take a very strong wind to turn one to the turbines, I believe that the wind farm will provide to be an effective solution.

Respectfully yours,



Fred Beaufait, FASOE, PhD

Isabel Benson Comment – March 22, 2007

From: ISSY [mailto:issy1to4@comcast.net]

Sent: Thursday, March 22, 2007 8:37 PM

To: Nickerson Karen J (DOS)

Subject: Wind Farms Now

Ms Nickerson,

The decision to be made regarding power in the state of Delaware is not one that can be wrong without huge ramifications. Please use your voice to support the people of Delaware who have overwhelmingly given their support to innovation and regard for the future. We have no more time to make cautious mistakes. Business as usual is not an option in these times. Morally, scientifically, and humanly there is only one way to decide the power issue. Wind power NOW and for our future.

Isabel Benson RN BSN OCN

Public Service Commission:

I am writting this letter for support for wind power over coal power.

We should choose wind pwoer over coal power beacuse wind power would produce a cleaner way to get the energy that we need. In the long run this will help to prevent global warming.

Also, i think we should use power over coal power beacuse wind is renewable. There is always wind for us to use and if we can get the energy that we need from wind i think we should.

Wind power also comes at much more stable prices unlike coal that is always fluctuating.

In conclusion, I think using wind turbines instead of coal would be a much more efficient way of Proudcing energy.

Sincerely,

Laurie Bowen

RECEIVED
07 MAR 27 AM 11:33
DELAWARE P.S.C.

Dear Public Service Commission,

Recently we have come upon a difficult decision in the state of Delaware. Our entire economy may be based on this very decision, energy runs our life but where does it come from and what or who does it effect? To put it simply it affects everything and every one, it basically runs our life. And even though in the past we have sufferer ed from harmful methods to contain energy sources we still have time to make a change and switch our power resources from coal to wind power. As a concerned citizen i feel it necessary to stay informed about our options and try to save our planet stop contributing to global warming. By switching to wind power energy we can decrease the destruction of our land and air. Even our water is affected by where our power comes from. Also instead of wasting our coal on simple things such as house hold appliances and useless house lights that we may not even use. Also coal is a non-renewable resource and it also leaves UN-helpful ruminates but wind power uses up the entire source and leaves on power that can be used to help the earth. Also in some situations there has been reports where the coal ruminates have in fact leaked into rivers and polluted an entire town's water supply. Coal is also not an unlimited resource and eventually the coal will run out and we will be left in shock of the tragedy's caused by lack of power. In conclusion I believe that wind power is much more valuable and economy friendly source that should be used for power in the state of Delaware. Thank you for your time and I hope you consider a concerned citizens word and consider my proposition.

Sincerely,
Nadine Brittingham

RECEIVED
07 MAR 27 AM 11:33
DELAWARE P.S.C.

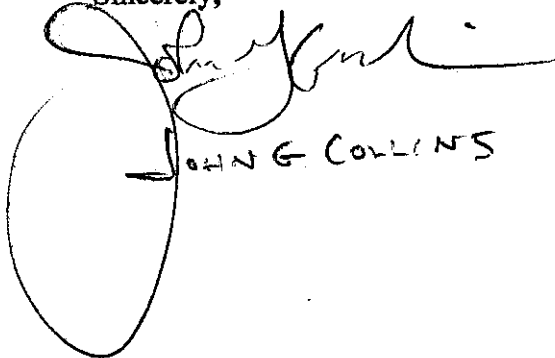
DEAR ARNETTA,

3/20/07

To Whom It May Concern:

In response to a request for new electric power in Delaware, I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's Integrated Gasification Combined Cycle bid. We do not have to be the guinea pigs for untested and unproven CO₂ underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. This could be an incredible opportunity to create a cleaner environmental future for ourselves, our children, and our communities. There are enormous opportunities in wind power, and I want the state of Delaware to capture them. Thus, I strongly support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,


JOHN G. COLLINS

Thank you so much
for your notice on
this issue - we
really appreciate your
support!

RECEIVED
207 MAR 23 AM 11:07
DELAWARE P.S.C.

Kathy J. Davis Comment – March 23, 2007

From: Kathy J Davis [mailto:kjdavis@wlgore.com]
Sent: Fri 3/23/2007 9:31 AM
To: Nickerson Karen J (DOS)
Subject: No Vote

Karen,
I'd like to add my "No" vote against the proposals for more plants in Delaware by NRG and Conectiv.

Regards,
Kathy Davis

Attention public service
Commission,

RECEIVED
FEB 23 AM 11:07
DELAWARE P.S.C.

I am writing you
today to express my
support for wind power.
I think we should have
this because the supply
will never run out. It
is a renewable resource.
Wind will lead to greater
price stability. Lastly,
our environment would
be cleaner and there
would be less global
warming. I hope you
will consider this.

Sincerely

Ashley Dennis

3/20/07

To Whom It May Concern:

In response to a request for new electric power in Delaware, I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's IGCC bid. We do not have to be the guinea pigs for untested, unproven CO₂ underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. Thus, I support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,

Erin Dilworth

Erin Dilworth

University of Delaware '09

Co-President; Students for the Environment

RECEIVED

07 MAR 23 AM 11:06

DELAWARE P.S.C.

Carol Dobson Comment – March 21, 2007

From: Carol Dobson [mailto:caroldob@gmail.com]

Sent: Wednesday, March 21, 2007 3:49 PM

To: Nickerson Karen J (DOS); Howatt Robert (DOS)

Subject: Resending Public Hearing Testimony by Carol Dobson at Georgetown PSC Public Hearing, 3/12/07

Testimony at PSC Public Hearing on 3/12/07, Georgetown, DE by Carol M. Dobson, 33770 Woodland Circle, Lewes, DE 19958.

As a nation, our country has failed to limit pollution from coal combustion waste. This failure has produced approximately 129 million tons of the this waste each year. In a 2004 study of the amount of coal ash generated by each state, Delaware generated 121 thousand short tons, of which only 24 short tons or 20% was determined to be used beneficially. This means that 80% of Delaware's coal ash was allowed to harm the public and the environment with toxic chemicals such as mercury, arsenic, lead, cadmium, chromium, and selenium, all known contributors to cancer.

A new EPA Risk Assessment (made public by www.earthjustic.org) finds extraordinary cancer risk from coal ash, the combustion waste generated by coal burning power plants. This new finding reveals that the risk is 10,000 times greater for developing cancer from coal ash than the present government safety standards allow. This means that the EPA's regulatory goals for reducing cancer risks are grossly inadequate for limiting the exposure and protecting the public against the health threats of America's 2nd largest solid waste stream, coal ash.

These new findings are more than frightening, they are disastrous. Right now when we, the citizens of Delaware, find ourselves demanding the PSC require redacted information from the bidders' proposals be provided about emissions levels and full disclosure of the contents of the proposals, we also find out that the EPA's current regulations allow for a cancer risk that is 10,000 times greater than what had been thought.

I have a friend who lives in Riverbend Development, 3/4 mile upriver of the Indian River Power Plant, next to Sandy Beach on the same side as the power plant. She couldn't be here tonight and asked me to tell you her experience with coal ash. She says she had no idea she would have black dust and how much of it she would be breathing. In the winter with windows shut she can see black soot inside her house on window sills, on the tops of toilet tanks, and on her miniblinds. In the summer it's much worse with the windows open. One summer eveing she heard an explosion in the middle fo the night and when no fire alarm went off she wondered if it was the power plant. The entire next week there was four times the amount of soot as usual...real fine little specs of soot. She and her neighbors can hear boom in the middle of the night during the summer months and one week there were three or four booms in one week. A neighbor commented to her bad it was. She's concerned about how much she and her family and neighbors are breathing when they dust off their furniture...when they breathe the air in and around their houses. Who can answer her questions?

We can be smart and decide right now that we won't be victims anymore. We won't continue using coal-burning power. We'll use clean, renewable, non-emissions-generating power and be proud to be survivors of this nightmare. I urge the PSC to make the right choice and give renewable, non-polluting wind power a chance...our chance to survive. The costs are just too much for the damage to our health and environment. The benefits of non-polluting power sources may be costly up front, but we can't afford to wait any longer. Prices for energy can stabilize over time with renewable, clean power. The price of polluting energy sources will never stabilize, they will always be a cost we cannot afford to pay.

Thank you.

Carol Dobson Comment – March 28, 2007

From: Carol Dobson [mailto:caroldob@gmail.com]
Sent: Wednesday, March 28, 2007 4:59 PM
To: Nickerson Karen J (DOS)
Subject: Kudos to the PSC Staff

Dear Ms. Nickerson,

I wish to send a big thank you to Mr. Geddes and all the staff who have been working smart and hard on our behalf.

I attended the March 20th PSC meeting and wish to send my thanks to Chair Arnetta McRae for using skillful and insightful means to conduct that meeting. I was very impressed with her leadership and wish to send her a special congratulations for a job well done. Yesterday I attended the hearing before Chancery Court in Georgetown and Mr. Geddes delivered an outstanding case for the release of the documents. Of particular interest to me and my friends and neighbors was the emphasis on the clamoring of the public for this readacted information. When during the course of the NRG lawyer's testimony that allowing more time for their appeal would not interfere with the timetable because the meeting of all four state agencies wasn't until May 8th, Mr. Geddes emphasized that public input is to be received based on the use of this information and that asking for an extension of time would interfere with the Commission's duty to keep the public informed in a timely manner so that the public could get their comments and questions to the PSC before the agencies meet. Mr. Geddes presented a strong case and I am very thankful that the need for public input to be gained in a timely manner was instrumental to achieve success yesterday.

Please give a well deserved thank you to all the staff and comission members for staying the course with grace and doing the right thing. Balance was achieved by the commission's decision and and deemed so by Chancery Court. What more could anyone ask for?

Sincerely,

Carol Dobson
33770 Woodland Circle
Lewes, DE 19958

Craig Fraser Comment – March 23, 2007

From: Craig Fraser [mailto:wcf2302@yahoo.com]

Sent: Friday, March 23, 2007 3:46 PM

To: Nickerson Karen J (DOS)

Subject: support for wind power

Dear Ms. Nickerson-- Please add my name to those supporting wind power as our new energy source for Delaware.

Thanks for your time,

Craig Fraser

Rehoboth Beach

Alison Gaffney Comment – March 23, 2007

From: alison gaffney [mailto:xiaoru412@yahoo.com]
Sent: Friday, March 23, 2007 12:30 PM
To: Nickerson Karen J (DOS)
Subject: Delmarva Power RFP

Dear Karen Nickerson and the Public Service Commission,

I am writing with great concern about the energy decision facing the State of Delaware. I grew up in Sussex County. At the age of twenty-five, I am now just about to complete a Master's degree program in California, and I am grappling with some decisions of my own, considering a possible move back to Delaware. The State's decision regarding a new source of energy looms large in my thoughts. Will Delaware be a good state in which to raise a family, or will it continue to cater to big business interests and pollute the air all residents must breathe? Will the state government demonstrate a willingness to listen to the concerns of its citizens and work with the public to truly create a Livable, Sustainable Delaware? In a time when climate change is being discussed in Congress, in global forums, and on the local news, will Delaware rise to the occasion to be a leader within the wind energy field in the United States, or will it take a step backward and continue to support coal or natural gas?

I have lived just across the river from NRG's Indian River Power Plant and know very well the toxins that the state has permitted the plant to release year after year. The state has chosen to allow a few individuals at NRG to reap great profits at the expense of residents' health. If I see that the state continues to support high-polluting businesses such as NRG, how can I in good conscience start and raise a family in Delaware?

The state, the nation, and indeed the world have reached a crossroads. We have the power now to choose to create a sustainable future, or we can continue to slowly destroy the beautiful place we call home. There is no such thing as clean coal. The gasification technology that NRG proposes has only been demonstrated in two small plants in the country, and the carbon sequestration is unproven technology -- technology that could never be applied in the sandy deposits of Delaware's geology at any rate. Furthermore, NRG's reluctance to share the full facts of its proposal (such as the number of employees the gasification plant would employ and the true cost of energy per unit) shows that NRG does not deserve the public's trust and does not deserve this contract. Connectiv's natural gas proposal may not be as full of holes as NRG's, but it is still an old fossil fuel technology that will not be enough at this critical juncture in human history. Many wind farms already exist in the United States, and offshore wind farms are producing power for Europe. The technology is proven and sound. Delaware could easily become an energy exporter. Here is a chance to use our natural resources without destroying them for future generations.

When I see Delaware's slogan, "It's good being first," I think of this upcoming energy decision. Delaware has the opportunity to be home to the first offshore wind farm in the United States. Here is the chance for Delaware to be a leader for our country. If the individuals in our state agencies have the courage to lead and the foresight to choose wisely now, Delaware could indeed be an environmentally healthy place in which to raise a family.

Please don't follow the path of business-as-usual. Let Delaware be a leader in wind power.

Sincerely,
Alison Gaffney

Wendy L. Gainor Comment – March 21, 2007

From: Wendy L. Gainor [mailto:wlg@MedSocDel.org]

Sent: Wednesday, March 21, 2007 4:33 PM

To: Nickerson Karen J (DOS)

Cc: Rivera Jaime Gus H (DHSS)

Subject: Medical Society of Delaware Letter to Delaware Public Service Commission - Regarding Public Comment Period ending March 23, 2007 - Sustainable and Renewable Power Sources

Importance: High

Dear Ms. Nickerson,

Attached please find our letter of comment in response to the upcoming public comment period deadline of Friday March 23, 2007. Please drop a note back to confirm receipt of our letter and let me know if you have any difficulty in opening the attachment. I appreciate your forwarding our comments on to other individuals/organizations as appropriate. Thank you.

Best regards, Wendy.

Wendy L. Gainor

Senior Director, Professional Services

Medical Society of Delaware

131 Continental Drive

Suite 405

Newark, DE 19713

Phone: (302) 658-7596 ext. 232

Direct Dial: (302) 224-5186

Fax: (302) 658-9669

E-mail: wlg@medsocdel.org

Patricia Gearity Comment – March 23, 2007

From: Patricia Gearity [mailto:gearitylaw@earthlink.net]
Sent: Friday, March 23, 2007 12:19 PM
To: Nickerson Karen J (DOS)
Subject: Delmarva Power RFP

Dear Ms. Nickerson:

Kindly provide each of the Commissioners with a copy of this email and the attachment. Please assure that this communication and the attachment are posted as part of the public record for this RFP.

Thank you very much.

March 23, 2007

**Ms. Arletta McRae, Commission Chair
Commissioner Jeffrey Clark
Commissioner Joann Conaway
Commissioner Jaymes B. Lester
Commissioner Dallas Winslow
Delaware Public Service Commission
Dover, Delaware 19904**

Dear Ms. McRae & Fellow Commissioners:

I am attaching a letter from Delmarva Power President Gary R. Stockbridge, dated March 15, 2006, in which Mr. Stockbridge informs customers that Delmarva cannot control the prices of natural gas & coal. This is accompanied by a graph showing a 400% increase in natural gas prices since 1999.

Now, a year later, Delmarva Power's consultant says that the Conectiv natural gas bid scores best for price. This conclusion defies common sense and the facts set forth on March 15, 2006.

HB6 was passed to address voter demand for a change. It is not acceptable for the Agencies to avoid a decision on this matter. The public is not willing to let power costs become a political football. Once political and campaign fundraising considerations are set aside, this becomes a clear choice for Delaware's economy, the health of its citizens, and the environment.

There is only one bid which meets the criteria of HB6 to diversify energy sources, provide stable pricing at a reasonable cost, and promote a clean (not just "cleaner") environment. Please support the Bluewater Wind project.

Sincerely yours,

**Patricia E. Gearity
PO Box 96
Harbeson, Delaware 19951**

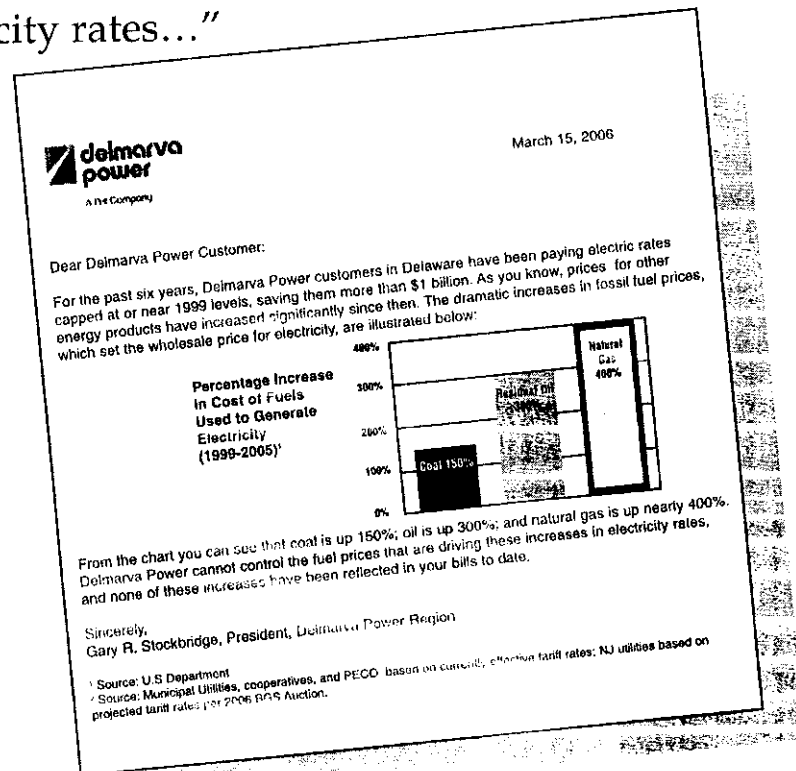
WHAT A DIFFERENCE A YEAR MAKES

In 2006 the President of Delmarva Power stated:

"...coal prices increased 150% and natural gas prices almost 400% over a 6 year period."

He further stated: (See letter below, abridged from original.)

"Delmarva Power cannot control the fuel prices that are driving these increases in electricity rates..."



Now – one year later:

Delmarva Power says “no bid” is good enough, and wants to set prices from the open market. This will mean more price instability and price hikes.

What has changed? **NOTHING!!**

Say - **NO** - to business as usual from Delmarva

Say - **YES** - to Wind Power

Write your legislators. Tell them you support wind.

For information go to:

<http://www.abettersussex.com/ENERGY 4 DE.html>

Citizens for Clean Power

William Gearity Comment – March 22, 2007

From: Rich Gearity [mailto:rgearity@sbcglobal.net]
Sent: Thursday, March 22, 2007 8:24 PM
To: Nickerson Karen J (DOS)
Subject: A Letter from Connecticut about BlueWater Wind Project

To: Karen Nickerson
From: William R. Gearity

Dear Ms. Nickerson -

Can you please copy the following letter and provide a copy for each of the PSC Commissioners - thank you for your help and consideration.

Sincerely,

William R. Gearity

Dear Sir or Madam -

I am writing to you this evening to express my support as a resident of the State of Connecticut for the Bluewater Wind offshore wind project.

Because pollution from coal-fired plants in Delaware is carried north to Connecticut, residents in my state are very interested and engaged with the current debate in Delaware over coal-fired powerplants versus Natural gas and wind power. In following the debate for the last year, it is clear that there is a strong coal lobby in Delaware with money and influence which seeks to gain favor with lawmakers in building new coal plants - I am hopeful that intelligent and forward thinking legislators such as yourself will consider the clear benefits in wind power - not only to your constituents - but what it will mean in reducing pollution that flows to your neighbors to the north.

Many eyes in this country are looking to Delaware to make a decision that will pay benefits for generations to come by not only reducing pollution and, therefore, the many cancers that are linked with it, but by showing leadership on the renewable energy front at a time when this country needs a legislative body to take a bold step and start this country down the path of **implementing** renewable energy sources instead of continuing to simply talk about them.

I, as well as my fellow New Englanders, are waiting and watching to see if the great state of Delaware will take the initiative on Wind Power, and provide an example which not only may encourage other states to follow suit, but will send a strong message to the international community that America is serious about being an innovator on the renewable energy front and is taking the first step in that direction.

Please don't let Delaware simply be another notation in a long list of legislative bodies that came so close to approving alternative energy sources but in the eleventh hour turned their back. Please don't be another state approving a coal plant or natural gas facility because it is simply the easy way out - there is nothing bold or innovative there. Rather my hope is that Delaware says "Right here, right now we are taking a stance against foreign oil and the revenues that support international terrorism....we are taking a stance against once again approving yet another pollution-producing coal plant at a time when global warming from existing powerplants is threatening the Earth.....we are standing FOR wind power and AGAINST business as usual and we are going to help propel our state and country down the path of renewable energy and assist our northern neighbors by reducing pollution."

I hope you will strongly consider supporting the Bluewater Wind offshore project.

I thank you, my fellow New Englanders thank you and future generations will thank you.

Sincerely,

William R. Gearity
Woodbury, Connecticut

RECEIVED

07123 23 MAR 06

DELAWARE P.S.C.

2/15,

Public Service Commission,

I am writing this letter to express my yearning for wind power. Wind power is a renewable source, which we can use over and over again. Wind power is not really expensive and prices are more stable. Wind power could solve all our energy needs. It's a clean fuel we need to use because of global warming. It won't pollute the air which leads to us having an unhealthy earth. The only time it wouldn't work is if there's no wind. But, I doubt that because there is always going to be wind out there.

Sincerely,

DeShawn Edwards

March 19, 2007

To Whom It May Concern:

In response to a request for new electric power in Delaware I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's IGCC bid, nor do we have to be the guinea pigs for untested, unproven CO2 underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. Thus I support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,

Handwritten signature of Kimberly M. Garatt in black ink.

RECEIVED
07 MAR 23 AM 11:06
DELAWARE P.S.C.

RECEIVED
07 MAR 27 AM 11:32
DELAWARE P.S.C.

To whom this may concern,

I am writting this letter to you explain the reason why I think wind power is the way to go.

The reason why I support wind power instead of coal power is because for one wind can be reused unlike coal. And by using the technology that produces wind power over and over again we could save more money. Also the reason why I feel wind power is the way to go is because it won't contribute to global warming at all.

As you can see, wind is the way to go for so many reason. Mostly because it can be reused, saves money, and will not contribute to global warming.

Sincerely
Jeremy, Henry

3/20/07

To Whom It May Concern:

In response to a request for new electric power in Delaware, I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's Integrated Gasification Combined Cycle bid. We do not have to be the guinea pigs for untested and unproven CO₂ underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. This could be an incredible opportunity to create a cleaner environmental future for ourselves, our children, and our communities. There are enormous opportunities in wind power, and I want the state of Delaware to capture them. Thus, I strongly support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,

Rachael Horley

RECEIVED
07 MAR 23 AM 11:06
DELAWARE P.S.C.

Richard Kauffman Comment – March 22, 2007

From: RICHARD KAUFFMAN [mailto:dick.kauffman@verizon.net]

Sent: Thursday, March 22, 2007 10:45 PM

To: Nickerson Karen J (DOS)

Subject: Wind Power offers a New Opportunity for Delaware

Just a brief note in support of Wind Power.

"If we always do what we have always done we will always get what we always got". Never was this saying more true. With Coal power generation we have gotten more pollution that threatens the very planet we live on...we have reaped the negative health impact on people, animals and fish that has destroyed not only many human lives, but the creatures we depend upon for the best that God intended for us. We have ever increasing costs for our energy as we go about our efforts to mine the coal, transport it and burn it.

With Wind Power initial monetary costs will be higher, but there is no comparison to the ever increasng costs, economic and personal of the burning of fossil fuels. Delaware stands on the edge of opportunity to lead the nation into a new era of hope for our future and the future of the planet. Please seize the moment to move in a new direction....choose Wind Power!

Sincerely,
Richard F.Kauffman
38279 Waterway Drive
Ocean View DE 19970

3/20/07

To Whom It May Concern:

In response to a request for new electric power in Delaware, I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's Integrated Gasification Combined Cycle bid. We do not have to be the guinea pigs for untested and unproven CO₂ underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. This could be an incredible opportunity to create a cleaner environmental future for ourselves, our children, and our communities. There are enormous opportunities in wind power, and I want the state of Delaware to capture them. Thus, I strongly support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,

Laura E Magee

I am typically proud of Delaware's tendency to be on the cutting edge of technology and efficiency. I am very excited about this opportunity for Delaware to take part in offshore wind power as well. I am very concerned about environmentally friendly power; I sincerely hope Delaware will take a stand and be on the cutting edge of taking advantage of offshore wind power, as an example for the rest of the country. Please vote for offshore wind power for the new power plant! Make me proud of our state!

Many thanks for
your consideration,

Laura E Magee

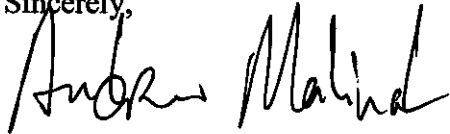
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01 APR 23 AM 11:06
DELAWARE P.S.C.

March 19, 2007

To Whom It May Concern:

In response to a request for new electric power in Delaware I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's IGCC bid, nor do we have to be the guinea pigs for untested, unproven CO2 underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. Thus I support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Malina". The signature is fluid and cursive, with the first name "Andrew" and last name "Malina" clearly distinguishable.

UNIVERSITY OF DELAWARE

RECEIVED
07 MAR 23 AM 11:09
DELAWARE P.S.C.

Sue Martell Comment – March 22, 2007

From: Sue Martell [mailto:sue.martell@gmail.com]
Sent: Thursday, March 22, 2007 8:29 PM
To: Nickerson Karen J (DOS)
Subject: Delaware Plants

I live 2 miles from Delaware City and there are enough pollution emitting plants there.

The odors that offer come from DE City is horrendous. I just shudder whenever I smell it, realizing the health damage that it is causing me.

I would prefer the cleaner, more expensive windpower over most nasty emission.

I vote NO!!!

Sue Martell

Kendra McBride
Human Studies
Feb 15, 2007

RECEIVED

07 MAR 23 AM 11:07

DELAWARE P.S.C.

Attention Public Service Commission,

I am writing to you today to express my support for wind power. I think that we should have wind power because we won't have as much greenhouse gas which leads to global warmings. My opinion is that if we have more wind turbines we will never run out of electricity because it's a natural resource. With coal we will have to waste money to buy more.

As a result I think that wind turbines would be a great way for us to cut down on cost and other things. I hope you will consider wind power for our state's future energy.

Sincerely, Kendra McBride

3/20/07

To Whom It May Concern:

In response to a request for new electric power in Delaware, I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's IGCC bid. We do not have to be the guinea pigs for untested, unproven CO₂ underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. Thus, I support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,

Lauren McCulley

RECEIVED
07 MAR 27 AM 11:34
DELAWARE P.S.C.

K. McMurray Comment – March 22, 2007

From: K mcmurray [mailto:kavips2006@yahoo.com]

Sent: Thursday, March 22, 2007 10:41 PM

To: Nickerson Karen J (DOS)

Cc: tomnoyes@gmail.com

Subject: Historical Perspective of PSC's Recommendation of Bluewater Wind's Proposal

A little over two millennium ago, the roots of our western civilization stood on the brink of eradication. Only a small band of Greeks stood between the massive Persian army and the destruction of Athens, the foundation of democracy and defender of fine arts. Ironically had the outcome of the battle been different, perhaps it might be us placing IED's along roads built and traveled by those descendant of that Persian stock.

But against such invincible odds, this small band of men chose to fight, and took the necessary action, even though outnumbered against the greatest army ever to land upon Grecian shores. Through strategic planning and personal courage, they stood fast against the onslaught and changed the course of history..

Now we too stand at a crossroads, where our choices and bravery will lead to great consequences. Our nemesis, however, is one we have brought upon ourselves.

Of the hottest years ever recorded in history, twenty one have occurred during the last twenty five. The ten hottest years on record, have occurred since 1993. Five of those hottest years have occurred since 2000. The year 2005 was the hottest on record. Last year 2006 was the hottest ever in America. This winter, the one we finished yesterday with the first day of spring, is the hottest winter ever recorded. This problem is not static; it grows worse with every day.

A decision is about to be made, regarding the future generation of Delaware's electricity. This decision, though made by a few, will certainly affect many. Due to its timing, this is to be one of the first major decisions ever made by a state in real time regarding renewable energy. Blue Water could be up and running in little over two years, not fifteen. Other states and other nations have the distinct possibility of being influenced by our success to such a degree, that man's ultimate footprint upon this planet may have the distinction of being first decided in our small state.. One can hope, that instead of dooming us to continued carbon dependency, the choice made, will prove to all, that wisdom, open mindedness, and courage still do exist among Delawareans and that Delaware can indeed count on those traits to assist us when choosing what is best for our future.

It will require great courage to vote for Blue Water's wind proposal. For we will not know what problems may yet appear over the future's horizon. As someone already mentioned, on these shores wind power is untested. But a cold eye cast towards gas or coal can quickly discern monstrous problems down those two roads if we follow either of those options.

There will be great pressure upon you in the PSC to take the comfortable choice, and avoid the upcoming battle against the carbon interests for deciding to make the "right" choice. But in years ahead, the gravest of consequences are predicted to befall each of us should you fall short and err in judgment. With gas and coal both expected to continue their steep price climb over the next twenty five years, any wrong choice could burden this struggling small state to the point of economic exhaustion.

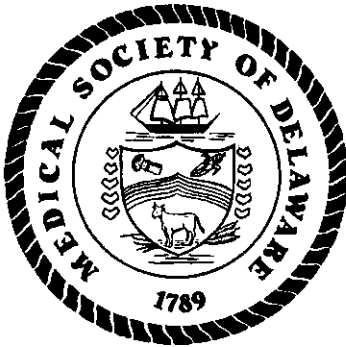
Only the fresh puff of wind can break this downward trend. Blue Water's generation plan can give us, the army awaiting your decision, the extra economic lift we need to face down the multitudes of obstacles arrayed before us.

Be known, that as you confer in your tent that is flapping in the stiff breeze, and ponder the strategies arrayed upon the ground before you, that you have an loyal army of public opinion, over ninety percent, ready to take on any hardship, attack any risk, and march forward into any battle at your side, should you decide to lead us to renewable energy. We do it willingly, not for glory, not for honor, not for personal aggrandizement, but because we are truly in awe of the immense and profound consequences that our small state's actions may impart to the future of all civilization.

Should Delaware fall short, fail to do its duty, and continue to compromise its future by the rapid exhumation of carbon fuels, we no doubt shall one day be viewed as harshly as that poor fool who panicked and guided the Persians to a secret path through the mountains, thereby surrounding those brave souls, whose valiant effort against incredible odds, managed to save Athens and the future of western civilization.

Now civilization looks to us.

When the ultimatum is laid before us, demanding that we too sign over our state's future to those armies beholden to the carbon kings, and threaten to blot out our sun with hundreds of thousands' of tons of emissions volleyed in our direction, let us hope that we too, fully mindful that we guard our own Thermopylae through which these monstrous armies of carbon interests must pass, stand shoulder to shoulder, and reply " In that case, we shall fight in the shade....."



MEDICAL SOCIETY OF DELAWARE

March 17, 2007

RECEIVED
07 MAR 23 AM 11:05
DELAWARE P.S.C.

OFFICERS
JANICE E. TILDON-BURTON, M.D.
PRESIDENT

KELLY S. ESCHBACH, M.D.
PRESIDENT-ELECT

NICHOLAS O. BIASOTTO, D.O.
VICE PRESIDENT

JOSEPH F. RUBACKY III, D.O.
SECRETARY

GARTH A. KONIVER, M.D.
TREASURER

JOSEPH A. LIEBERMAN III, M.D.
SPEAKER OF THE HOUSE

PETER B. PANZER, M.D.
VICE SPEAKER OF THE HOUSE

JAMES P. MARVEL, JR., M.D.
PAST PRESIDENT

MARK A. MEISTER, SR.
EXECUTIVE DIRECTOR

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JAMES M. GILL, M.D.
JOHN J. GOODILL, M.D.
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PAUL W. MONTIGNEY, M.D.
DOROTHY M. MOORE, M.D.

Sussex County
JOHN L. PANICO, M.D.

Council on Medical Specialties
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DAVID M. BERCAW, M.D.
BRIAN E. BURGESS, M.D.
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STEPHEN J. KUSHNER, D.O.
BHASKAR S. PALEKAR, M.D.
ANDREW P. ROBINSON, M.D.
KEVIN P. SHEAHAN, M.D.

AMA Delegates
MICHAEL J. BRADLEY, D.O.
STEPHEN R. PERMUT, M.D.

DELPAC Representative
MICHAEL S. KATZ, M.D.

Editor, Delaware Medical Journal
PETER ROCCA, M.D.

Editor Emeritus, Delaware Medical Journal
E. WAYNE MARTZ, M.D.

Legislative Chair
JOSEPH F. HACKER III, M.D.

Resident Representative
SUSAN E. THOMPSON, D.O.

Young Physicians Section
DEBORAH T. ZAREK, M.D.

Ms. Karen Nickerson
Commission Secretary
Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Dear Ms. Nickerson:

I am writing on behalf of the Environmental and Public Health Committee of the Medical Society of Delaware (MSD) and MSD members in response to the request for public comment regarding sustainable and renewable power sources for Delaware. The mission of MSD, an organization of approximately 1,700 physicians in Delaware, is to guide, serve, and support Delaware physicians, promoting the practice and profession of medicine to enhance the health of our communities.

In keeping with our mission, MSD members tell Delaware lawmakers they care about policies that affect the hundreds of thousands of patients in our state. The physicians on the MSD Environmental and Public Health Committee have an interest in public health and wellness issues affecting the health of Delaware citizens. Prior activities have focused on the development and oversight of uniform clinical guidelines for various medical conditions including asthma, congestive heart failure, and coronary artery disease, as well as the support of tobacco cessation programs.

Another area of focus for the committee is air quality issues. Delawareans can choose to be in a smoke-free environment but we have no choice about the air that we breathe. We were recently provided with resolutions passed by the Florida Medical Association and Medical Association of Georgia which identify coal plants as a major source of pollution, global warming, mercury contamination in ocean wildlife, and as a cause of death, disease, cancer, heart and asthma attacks, strokes, and low birth weight babies. Shortly after receipt of these resolutions, MSD was made aware of the Delmarva Power's IRP and the proposals made in response to it including the addition of a gasification plant to the site of an existing coal burning site and the Blue Water Wind Proposal for an off-shore wind farm.

The Medical Society of Delaware supports less-polluting, more efficient power options that adhere to and strengthen Clean Air Act standards. **We do not support any one proposal at this time, but we urge the government and utilities to develop comprehensive energy conservation programs and to adopt improved energy efficiency standards.** Increased power should be given careful consideration and full public debate, and preference should be given to the least polluting options. We are in favor of clean and sustainable power sources which do not pose serious and known risks to our health.

Sincerely,

John J. Goodill, M.D.
John J. Goodill, M.D.
Chairperson, EPH Committee

wlg

cc: Janice E. Tildon-Burton, M.D., President, Medical Society of Delaware
Jaime Rivera, M.D., Director, Division of Public Health

131 Continental Drive, Suite 405, Newark, Delaware 19713-4308
302/658-7596 • 800/348-6800 (Kent & Sussex Counties) • 302/658-9669 (fax)

Tom Noyes Comment – March 23, 2007

From: Tom Noyes [mailto:tomnoyes@gmail.com]
Sent: Fri 3/23/2007 12:40 PM
To: Nickerson Karen J (DOS)
Subject: Re: Question about comments

Thank you for your reply.

I am attaching my comments as a pdf. Please let me know if you have any difficulty.

Tom Noyes

On 3/23/07, **Nickerson Karen J (DOS)** <Karen.Nickerson@state.de.us> wrote:
Mr. Noyes, if you are referring to the RPF docket (06-241) either way is fine. PDF files save us a step.
Whichever is easiest for you.

From: Tom Noyes [mailto:tomnoyes@gmail.com]
Sent: Fri 3/23/2007 9:40 AM
To: Nickerson Karen J (DOS)
Subject: Question about comments

Can comments be submitted as word docs, or would you prefer pdfs?

Thanks.

Tom Noyes

--

Thomas Noyes
1903 Delaware Avenue #1
Wilmington, DE 19806
302 652 3241
tomnoyes@gmail.com

--

Thomas Noyes
1903 Delaware Avenue #1
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Wilmington, DE 19806
302 652 3241
tomnoyes@gmail.com

March 23, 2007

Ms. Arnetta McRae
Chair
Delaware Public Service Commission
861 Silver Lake Blvd.
Dover, DE 19904

Re: PSC Docket 06-241

Dear Ms. McRae:

I am writing in support of wind power and opposition to the expansion of fossil fuel generation in Delaware. My views are informed by my experience in government negotiating environmentally complex, capital-intensive, long-term contracts, and also by the analytical tools I gained while earning an MBA in finance.

The conventional wisdom is that the public's environmental interest is in conflict with the public's economic interest. But my review of the record leads me to conclude that the conventional wisdom has been turned on its head in this case; burning more fossil fuels doesn't make economic or environmental sense for Delaware. Simply put, 19th century technology is not suited to meet the environmental and economic needs of the 21st century.

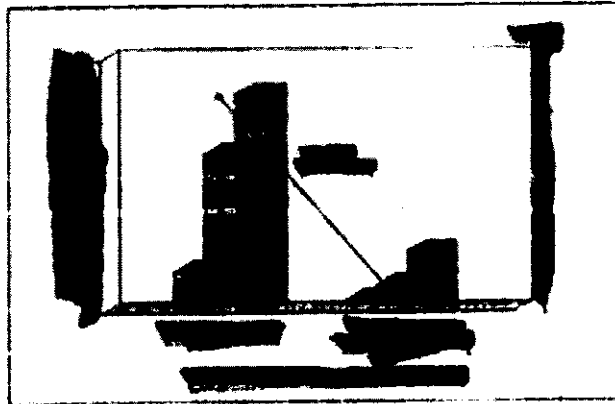
This shift in the conventional wisdom is evidenced by the recent \$45 billion private equity deal for TXU, which includes abandoning plans to build eight coal powered generating plants in Texas. Further evidence is provided by the rising chorus of business leaders, such as Jeff Immelt, the CEO of General Electric, speaking out in support of a national policy to control carbon emissions.

The redactions of the proposals make it difficult for even the most informed citizen to evaluate the options. Even so, I am convinced that a compelling argument can be made that our long term economic and environmental would not be served by building more fossil fuel plants in Delaware.

NRG, which wants to expand operations at its coal powered electric plant in Sussex County, is claiming that its proposal now before you will reduce air emissions. NRG's refusal to provide meaningful projections of future emissions makes it impossible to independently evaluate the company's claims.

The illustration below from NRG's redacted proposal purports to show the expected reduction in air emissions:

Figure 1-9 Air Emissions Impact Reduction



Looking at the chart, we don't know what emissions are measured, the scale or the base year. We don't know if this chart projects emissions in the company's proposal under current law or if it shows emissions using a future carbon capture technology. We don't even know if the illustrated reductions represent the new proposal or a combination of the new generating equipment combined with controls the company has already proposed to reduce mercury emissions, as noted here in April of last year. What we do know is that NRG is the perennial number one when it comes to air emissions in Delaware. Any other conclusion, given the company's refusal to release the most elementary environmental data, is guesswork.

The uncertainty extends to the economics of NRG's proposal. While we don't have all the data, the PSC's consultants' evaluation of the economics of the proposals includes these revealing scores for price stability:

Bluewater 20.0
NRG 0.0
Conectiv 0.7

In particular, NRG and Conectiv seek to place the entire economic burden of compliance with future controls on carbon emission squarely on the shoulders of consumers. Conectiv is seeking recovery of possible future carbon taxes. NRG has proposed an exception from provisions that it "absorb any additional environmental compliance costs caused by a change in law," and its "proposed pricing for [carbon] sequestration is essentially a cost pass through proposal that is inconsistent with the RFP requirements."

The technology of carbon sequestration is in its infancy. Perhaps the best estimate of the cost of carbon controls can be found in a study from MIT titled "The Future of Coal," which estimates that carbon sequestration is likely to increase the cost of electricity by 27 percent and reduce effective power generation by 19 percent. ("The Future of Coal," p. 30, <http://web.mit.edu/coal/>)

Similar uncertainties will affect the long term cost of energy of a new natural gas facility. But apart from the cost of carbon controls, it is unrealistic to assume that the price of gas will remain stable over the next 25 years. According to the U.S Department of Energy, the wellhead price of natural gas, measured in dollars per thousand cubic feet, increased from \$0.44 in 1975 to \$3.68 in 2000.

Given the technical and economic uncertainties of carbon controls and the likely increases in the price of fossil fuels, we are led to the surprising conclusion that wind power is the one option that offers proven technology at a predictable cost. This is why price stability is such a crucial consideration, in which we see the public's environmental and economic aligned.

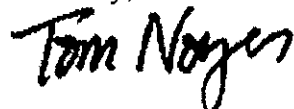
The lack of meaningful price protection in the Conectiv and NRG proposals leads me to conclude that building a fossil fuel plant in Delaware is not in the public interest. If the PSC and the other agencies involved determine that Bluewater Wind's proposal does not sufficiently meet the terms of the RFP, then my advice is to first, do no harm by not saddling consumers with the economic and environmental costs of fossil fuels.

These facilities have a useful life well beyond the 25 years specified in the RFP. If our state government makes the wrong decision, we will be living with the economic and environmental consequences long after most of us have retired to the old ratepayers' home.

The conventional wisdom no longer holds. Environmental and economic considerations are not in conflict, but are aligned; the time for fossil fuel power generation in Delaware has passed.

Thank you for the opportunity to offer my views on this important decision.

Sincerely,

A handwritten signature in black ink that reads "Tom Noyes". The signature is written in a cursive, slightly slanted style.

Thomas Noyes

James W. Prescott, Ph.D.

RECEIVED

07 MAR 27 PM 2:36

1140-17 Savannah Road DELAWARE P.S.C.

Lewes, DE 19958

302.645.7436

jprescott34@comcast.net

<http://www.violence.de>

<http://ttfuture.org/Prescott>

<http://montagunocircpetition.org>

24 March 2007

Ms. Arnetta McRae
Chairperson
DE Public Service Commission
and Commissioners
861 Silver Lane Blvd.
Cannon Bldg. Suite 100
Dover, DE 19904

Att: karen.nickerson@state.de.us

Dear Ms Arnetta,

An article in the CAPE GAZETTE 23 March 2007 "NRG sues to withhold emissions data from public", on the grounds of protecting proprietary information and "trade secrets" is an alarming assault of the right of the people to know what corporations are endangering the health and safety of its citizens, particularly infant and children.

Common law assures us that no citizen or corporation has the right to dump their garbage on the front lawns of their neighbors. The NRG has no right to withhold vital data that represents a threat to public health and safety and which is particularly injurious to the health and lives of infants and children.

I am requesting that you examine this request from NRG as a violation of the State of Delaware's statues on "child endangerment". No individual or corporation has the right to poison individuals or the environment.

Delaware can ill-afford the burden of increased "child endangerment" given its shameful record of infant mortality rates where it ranks 40th among the 50 states. See <http://www.violence.de/politics.shtml>

In my letter to Senators Biden, Carper and Congressman Castle (2 March 2007), on pollution in Delaware, I emphasized:

"I would like to bring to your attention the findings of *Clear the Air*, that Delaware's Power Plants at Edge Moor and Indian River are considered to be the leading polluters of power plants in America, attached. They report that "Soot emission cause dozens of premature deaths in Delaware every year"; that in the most polluted cities there exists a 12 percent increased risk of cardiopulmonary death over those living in the cleanest areas of the country; that children are the most susceptible to the detrimental effects posed by power plant air pollution where in Delaware, 142,099 children live within 30 miles of a power plant and that infants in areas with high levels of particulate matter pollution face a 26 percent increased risk of sudden Infant Death Syndrome and 40 Percent increased risk of respiratory death.

Power plants are responsible for 41 percent of the total mercury emitted by all known U.S. sources where mercury is a toxic metal known to inflict serious damage to developing fetuses, infants, and children.

Nicholas Bakalar of *The New York Times*, in an article "Cleaner Air Brings Drop in Death Rate (March 21, 2006) reports that "When air pollution in a city declines, the city benefits with a directly proportional drop in death rates". "For each decrease of 1 microgram of soot per cubic meter of air, death rates from cardiovascular disease, respiratory illness and lung cancer decrease by 3 percent—extending the lives of 75,000 people a year in the United States. The association held even after controlling for smoking and body mass index.

He further reports "In Steubenville, for example, soot declined to 22 micrograms per cubic meter from 27 over the course of the study, and the city had a corresponding 25 percent decrease in mortality risk. 'Consistently,' Dr. Laden said, "in the cities where there was the most cleanup, there was also the greatest decrease in risk of death."

<http://www.nytimes.com/2006/03/21/health/21soot.html?pagewanted=print>

My question Senator Biden is what are the particulate emissions, in micrograms of soot per cubic meter of air, from the power plants of Delaware and what is the expected decrease in these particulate emissions under the proposed "clean" power plants?"

Another indicator of the health of Delaware is the "Health Care State Rankings 2006" published by Morgan Quinto Press where Delaware ranks 37th among the 50 States in terms of Health, attached and at: <http://www.morganquinto.com/elec/44w1health6.htm>

Delaware is at the bottom of State Rankings in terms of overall health status among the 50 states, as measured by infant mortality and a composite index of state overall health. Toleration of pollution by the state is certainly a significant contributing factor and cannot be tolerated by State Officials who have responsibility for the overall health of the state.

The following recommendations are:

1. The State Legislature must amend state law that places the highest priority on safeguarding the health and safety of its citizens regarding any new power generating plants. Economic criteria are secondary and profit margins of corporate polluters should not receive greater priority than the health status of its citizens. Al Gore's recommendation for a moratorium on any new coal powered generating plants should be followed. "Clean coal" is an oxymoron.

2. The State Legislature must establish an emission particulate pollution that does not exceed 12 micrograms per cubic meter, as recommended by *The American Journal of Respiratory and Critical Care Medicine*. Power plant emissions, in micrograms per cubic meter, should be determined and published for the 15 most and 15 least power plants of this nation, as their appears some confusion on the magnitude of pollution of the power generating plants of Delaware.

3. All proposals for new power generating plants must publish their current particulate emission pollution and the expected reduction of these levels in their new proposals in micrograms per cubic meter.

4. Dr. Rivera, Director, Division of Public Health, Delaware Health and Social Services should be directed to assess the impact of air pollution on upon the health of infants and children and make recommendations for clean-up to meet the standard of 12 micrograms per cubic meter, as recommended by the *The American Journal of Respiratory and Critical Care Medicine*; and as Delaware has one of the worst public health records in the 50 states.

I trust that these observations and recommendations will be helpful to you in determining the best course of action for the future health of Delaware and its citizens.

Sincerely,



James W. Prescott, Ph.D.
Lewes, DE

Cc: Trish Vernon,
Editor, CAPE GAZETTE

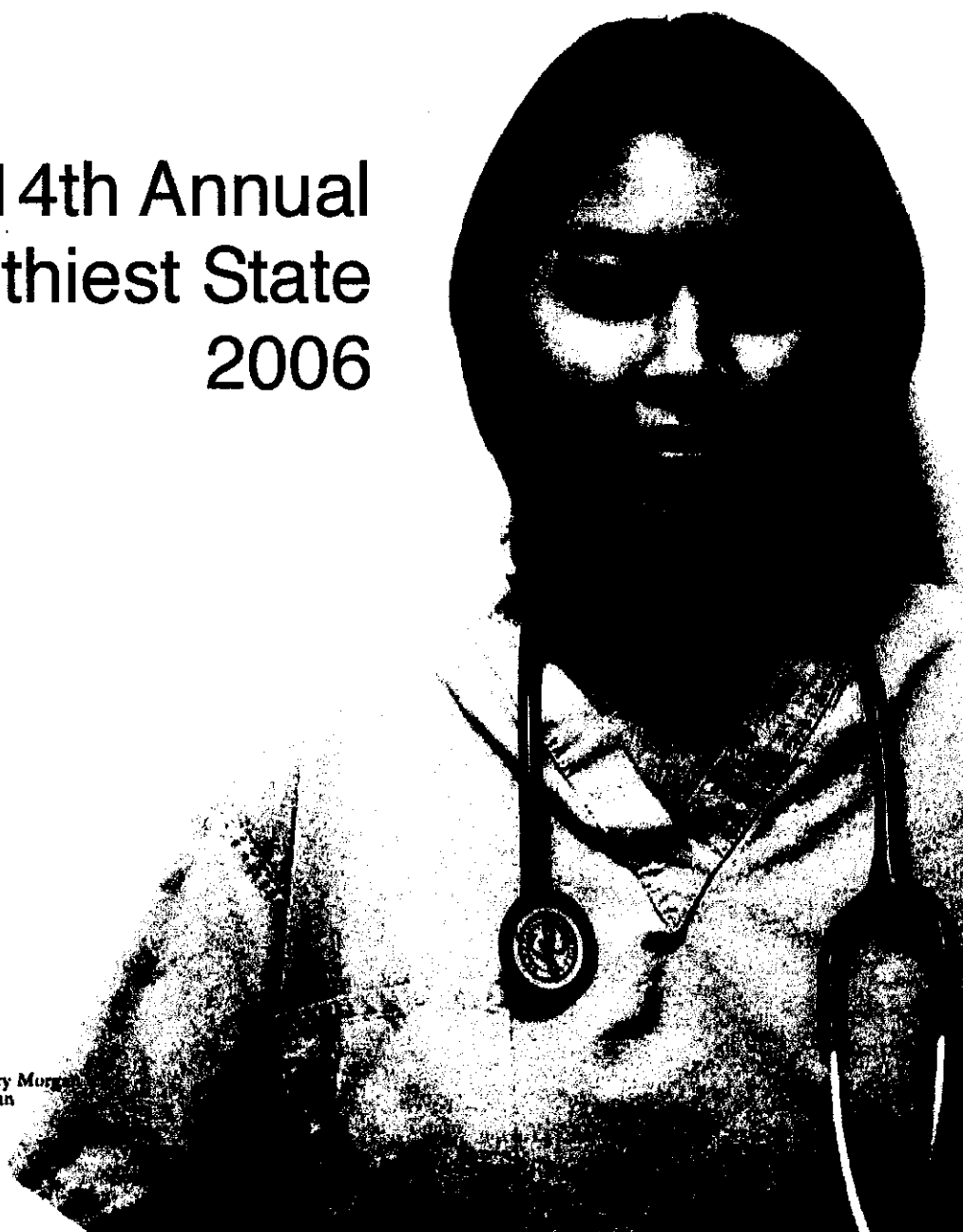
Joan Deaver
President, Citizens for a Better Sussex

Alan Müller
President, Green Delaware

Enclosures

Health Care State Rankings 2006

14th Annual
Healthiest State
2006




**MORGAN
QUITNO**
Healthiest State

Edited by
Kathleen O'Leary Morgan
and Scott Morgan

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The 14th Annual Healthiest State sells for \$4.99 as an online publication in PDF format. The book upon which it is based, Health Care State Rankings 2006 sells for \$59.95 (\$6 shipping) and is only available in paper binding. For those who prefer ranking information tailored to a particular state, we also offer Health Care State Perspectives, state-specific reports for each of the 50 states. These individual guides provide information on a state's data and rank for each of the categories featured in the national Health Care State Rankings volume. Perspectives sell for \$19 or \$9.50 if ordered with Health Care State Rankings. If crime statistics are your interest, please ask about our annual Crime State Rankings (\$59.95 paper). If you are interested in city and metropolitan crime data, we offer City Crime Rankings (\$49.95 paper). For a general view of the states, please ask about our annual State Rankings reference book (\$59.95 paper) or our new annual State Trends (\$59.95 paper). Also available is Education State Rankings. This view of preK-12 education at the state level is \$49.95. All of our books are available on CD-ROM in PDF format (same price as printed book) or with both PDF format and data sets in various database formats (\$99.95). Shipping and handling is \$6 per order. For information, please visit our website at www.statestats.com.

Fourteenth Edition

Results of the 2006 Healthiest State Award

Healthiest State Award Table of Contents (click on listing to go to that page)

Introduction and Methodology

Rankings

Past Rankings: 1993 to 2006

Rankings in 21 Factors

Books from Morgan Quitno Press

Negative Factors

1. Births of Low Birthweight as a Percent of All Births
2. Teenage Birth Rate
3. Percent of Mothers Receiving Late or No Prenatal Care
4. Age-Adjusted Death Rate
5. Infant Mortality Rate
6. Age-Adjusted Death Rate by Malignant Neoplasms
7. Age-Adjusted Death Rate by Suicide
8. Average Annual Family Coverage Health Insurance Premium
9. Percent of Population Not Covered by Health Insurance
10. Percent of Children Not Covered by Health Insurance
11. Estimated Rate of New Cancer Cases
12. AIDS Rate
13. Sexually Transmitted Disease Rate
14. Percent of Population Lacking Access to Primary Care
15. Percent of Adults Who Are Binge Drinkers
16. Percent of Adults Who Smoke
17. Percent of Adults Obese
18. Percent of Adults Who Do Not Exercise

Positive Factors

19. Beds in Community Hospitals per 100,000 Population
20. Percent of Children Aged 19-35 Months Immunized
21. Safety Belt Usage Rate

WHICH STATE IS HEALTHIEST?



For the fifth time in six years, Vermont has earned the title of the nation's Healthiest State. Morgan Quitno's 14th annual Healthiest State Award honors the Green Mountain State for its healthy population and access to affordable and reliable health care. Following Vermont were New Hampshire, Minnesota, Maine and Iowa.

At the opposite end of the rankings, Mississippi, also for the fifth time in six years, moved back to last place. Mississippi was preceded by New Mexico, Louisiana, Nevada and Texas.

Methodology

The Healthiest State designation is awarded based on 21 factors chosen from the 2006 edition of our annual reference book, *Health Care State Rankings*. These factors reflect access to health care providers, affordability of health care and a generally healthy population (see page three.)

As in previous years, the 21 factors were divided into two groups: those that are "negative" for which a high ranking would be considered bad for a state, and those that are "positive" for which a high ranking would be considered good for a state. Rates for each of the 21 factors were processed through a formula that measures how a state compares to the national average for a given category. The positive and negative nature of each factor was taken into account as part of the formula.

Once these computations were made, the factors then were weighted equally. These weighted scores then were added together to get a state's final score ("SUM" on the table on page five). This way, states are assessed based on how they stack up against the national average. The end result is that the farther below the national average a state's health ranking is, the lower (and less healthy) it ranks. The farther above the national average, the higher (and healthier) a state ranks. For this year's award, only one factor was changed. Instead of using the percent of adults who exercise vigorously as a positive factor, we substituted the percent of adults who do not exercise as a negative factor.

The table on page five shows how each state fared in the 2006 Healthiest State Award as well as its placement in 2005. We acknowledge that the factors we choose have a lot to do with the placement of states. However, our point is to encourage meaningful debate about the health of states and challenge others to choose factors they think reflect the general health of states. The exact order may change but the general placement would likely be the same regardless of the factors used. There are many reasons why a Vermont has a healthier population than Mississippi, but that does not invalidate the findings.

Congratulations (again) to the citizens of Vermont!

- THE EDITORS

The 2006 Healthiest State Award:

Vermont Stays on Top

ALPHA ORDER

RANK	STATE	SUM	05 RANK	CHANGE
42	Alabama	-10.05	41	-1
40	Arizona	-8.98	39	-1
19	California	6.84	18	-1
9	Connecticut	14.09	10	1
41	Florida	-9.42	44	3
10	Hawaii	12.34	8	-2
33	Illinois	-2.87	34	1
5	Iowa	16.13	6	1
26	Kentucky	1.56	32	6
4	Maine	16.47	5	1
6	Massachusetts	16.06	3	-3
3	Minnesota	18.66	4	1
34	Missouri	-3.10	36	2
7	Nebraska	15.81	9	2
2	New Hampshire	21.47	2	0
49	New Mexico	-19.45	48	-1
30	North Carolina	0.23	33	3
24	Ohio	2.60	26	2
15	Oregon	8.12	19	4
13	Rhode Island	9.19	12	-1
17	South Dakota	7.26	22	5
46	Texas	-12.98	45	-1
1	Vermont	21.99	1	0
20	Washington	6.76	13	-7
14	Wisconsin	8.94	14	0

RANK ORDER

RANK	STATE	LIVABILITY RATING	05 RANK	CHANGE
1	Vermont	21.99	1	0
3	Minnesota	18.66	4	1
5	Iowa	16.13	6	1
7	Nebraska	15.81	9	2
9	Connecticut	14.09	10	1
11	North Dakota	10.08	11	0
13	Rhode Island	9.19	12	-1
15	Oregon	8.12	19	4
17	South Dakota	7.26	22	5
19	California	6.84	18	-1
21	Virginia	5.43	17	-4
23	Michigan	2.71	23	0
25	Wyoming	2.11	30	5
27	Montana	1.30	25	-2
29	Pennsylvania	0.53	21	-8
31	New York	0.00	31	0
33	Illinois	-2.87	34	1
35	Maryland	-4.59	29	-6
37	Delaware	-5.34	35	-2
39	Alaska	-8.10	37	-2
41	Florida	-9.42	44	3
42	South Carolina	-10.05	43	1
45	Oklahoma	-11.87	46	1
47	Nevada	-15.44	47	0
49	New Mexico	-19.45	48	-1

Source: Morgan Quitno Press

James W. Prescott, Ph.D.

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<http://ttfuture.org/Prescott>
<http://montagunocircpetition.org>

2 March 2007

Senator Joseph R. Biden Jr
Wilmington Office
1105 N. Market St.
Suite 2000
Wilmington, DE 19801-1233

Dear Senator Biden,

I am in receipt of a letter dated June 28, 2006, forwarded to me by Joan Deaver, President, Citizens for a Better Sussex, and signed by yourself, Senator Tom Carper and Congressman Michael Castle and addressed to a Melissa Robe, National Energy Technology Laboratory, U.S. DOE, (attached).

In this letter you urge the DOE to approve the application submitted by the NRG for tax credits for the proposed Indian River IGCC Repowering Project in Millsboro, Delaware under Section 48A for tax credit eligibility. You state that this action is warranted by existing and long term public policy.

I would like to bring to your attention the findings of *Clear the Air*, that Delaware's Power Plants at Edge Moor and Indian River are considered to be the leading polluters of power plants in America, attached. They report that "Soot emission cause dozens of premature deaths in Delaware every year"; that in the most polluted cities there exists a 12 percent increased risk of cardiopulmonary death over those living in the cleanest areas of the country; that children are the most susceptible to the detrimental effects posed by power plant air pollution where in Delaware, 142,099 children live within 30 miles of a power plant and that infants in areas with high levels of particulate matter pollution face a 26 percent increased risk of sudden Infant Death Syndrome and 40 Percent increased risk of respiratory death.

Power plants are responsible for 41 percent of the total mercury emitted by all known U.S. sources where mercury is a toxic metal known to inflict serious damage to developing fetuses, infants, and children.

Nicholas Bakalar of *The New York Times*, in an article "Cleaner Air Brings Drop in Death Rate (March 21, 2006) reports that "When air pollution in a city declines, the city benefits with a directly proportional drop in death rates". "For each decrease of 1 microgram of soot per cubic meter of air, death rates from cardiovascular disease, respiratory illness and lung cancer

decrease by 3 percent--extending the lives of 75,000 people a year in the United States. The association held even after controlling for smoking and body mass index.

He further reports "In Steubenville, for example, soot declined to 22 micrograms per cubic meter from 27 over the course of the study, and the city had a corresponding 25 percent decrease in mortality risk. 'Consistently, ' Dr. Laden said, "in the cities where there was the most cleanup, there was also the greatest decrease in risk of death."

My question Senator Biden is what are the particulate emissions, in micrograms of soot per cubic meter of air, from the power plants of Delaware and what is the expected decrease in these particulate emissions under the proposed "clean" power plants?

As a health professional, I have had a long standing interest in the public health of this nation and have communicated these concerns to Dr. Rivera, Director, Division of Public Health, Delaware with respect to the shocking record that Delaware has one of the worst records of infant mortality in the United States, ranking 40th in infant mortality. See letters of correspondence with his office and Governor Minner concerning "INFANT MORTALITY IN DELAWARE: FAILURE OF A PUBLIC HEALTH SYSTEM" at <http://www.violence.de/politics.shtml>, attached.

The collective health statistics on child endangerment of the coal fired power plants in the United States and particularly, Delaware, should have led Dr. Rivera to recommend to Governor Minner the closing of the power plants as soon as possible, as a public health hazard or their immediate clean-up. The health and safety of our children demand this action.

How can you Senator Biden, along with Senator Carper and Congressman Castle contribute to child endangerment by given tax credits to those who endanger the health and lives of children? The state laws on child endangerment should apply equally to corporations and those politicians supporting those corporations that endanger the health and lives of children, as are parents who endanger the lives of their children. What is the applicability of Delaware state law on child endangerment to corporations that inflicts harm and injury upon children?

I urge you to rescind your recommendation to the DOE of tax credits to the NRG, as acting in callous disregard for the public health and safety of the children and the citizens of Delaware. Time is running out and according to James Lovelock, the measures taken today may be insufficient to stem the tide of injury to this planet, attached.

Sincerely,

James W. Prescott, Ph.D.

cc: Senator Tom Carper
Congressman Michael Castle
Governor Ruth Ann Minner
Dr. James Rivera
Joan Deaver

March 21, 2006

Cleaner Air Brings Drop in Death Rate

By NICHOLAS BAKALAR

When air pollution in a city declines, the city benefits with a directly proportional drop in death rates, a new study has found.

For each decrease of 1 microgram of soot per cubic meter of air, death rates from cardiovascular disease, respiratory illness and lung cancer decrease by 3 percent — extending the lives of 75,000 people a year in the United States. The association held even after controlling for smoking and body mass index.

The work, described in a paper in the March 15 issue of The American Journal of Respiratory and Critical Care Medicine, was carried out in six metropolitan areas: Watertown, Mass.; Kingston and Harriman, Tenn.; St. Louis; Steubenville, Ohio; Portage, Wyocena and Pardeeville, Wis.; and Topeka, Kan. The participants, ages 25 to 74 at enrollment, were followed from 1974 through 1998.

The scientists periodically measured concentrations of soot, or particulate air pollution, in each city. At the same time, they tracked disease and mortality among 8,096 residents. Particulate air pollution consists of a mixture of liquid and solid particles, mostly a result of fossil fuel combustion and high-temperature industrial processes. By definition, the particles have a diameter less than 2.5 microns, or about one ten-thousandth of an inch.

"For the most part, pollution levels are lower in this country than they were in the 70's and 80's," said Francine Laden, the study's lead author, "and the message here is that if you continue to decrease them, you will save more lives."

Further declines in air pollution are within reach, said Dr. Laden, an assistant professor of environmental epidemiology at Harvard. "The technology is out there," she said. "The cities that we've covered have cleaned up considerably over the course of the study."

In Steubenville, for example, soot declined to 22 micrograms per cubic meter from 27 over the course of the study, and the city had a corresponding 25 percent decrease in mortality risk. "Consistently," Dr. Laden said, "in the cities where there was the most cleanup, there was also the greatest decrease in risk of death."

Dr. Laden said the study supported what the federal scientific advisers had advocated: lowering the air quality standard below the present 15 micrograms per cubic meter. "There was discussion about lowering it to 12," she said, "and this study supports that."

Figure 1-10 Letter of Support: Sen. Joe Biden, Sen. Tom Carper, and Rep. Mike Castle

Congress of the United States

Washington, DC 20510

June 28, 2006

Malissa Robe
National Energy Technology Laboratory
U.S. Department of Energy
3610 Collins Ferry Road
Morgantown, WV 26507

Dear Ms. Robe,

This letter is being written in support of the NRG submittal to the U.S. Department of Energy (DOE) regarding the IRS Section 48A tax credits for the proposed Indian River KCC Repowering Project in Millsboro, Delaware.

As you may know, part of the application to the DOE is to note how the facility conforms to public policy. Having reviewed the NRG development plans, we believe the Indian River KCC Repowering Project is consistent with the stated goals of the City of Millsboro, Sussex County, and the State of Delaware. As such it is strongly supported by existing and long term public policy. We urge the DOE to approve the application for Section 48A tax credit eligibility.

Specifically, the Indian River site is to be located on an existing energy production facility with large amounts of existing coal and oil fueled electric power generation. Under the new project plans, after repowering, the new Indian River power station will produce more electric power while emitting significantly less pollution in Delaware. This new technology will have better efficiency and increase the site work force compared to the current plant. Finally, during construction, over \$1 billion will be invested into the Sussex County, Delaware economy. All of these aspects are clearly consistent with local, state and national public policy in any number of aspects.

We strongly encourage the DOE to approve the application for Section 48B tax credit eligibility. If we can be of further assistance, please do not hesitate to contact us.

Sincerely,


Senator Tom Carper


Senator Joe Biden


Congressman Michael Castle

Cc: Mr. Curtis Morgan, President
Northeast Division
NRG Energy, Inc.
241 Curran Center
Princeton, NJ 08540

James W. Prescott, Ph.D.

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<http://ttfuture.org/Prescott>
<http://montagunocircpetition.org>

25 March 2007

Senator Joseph R. Biden Jr
Wilmington Office
1105 N. Market St.
Suite 2000
Wilmington, DE 19801-1233

Dear Senator Biden,

This letter is a follow-up of my letter to you of 2 March 2007 and to share with you my letter of 24 March 2007 to Arnetta McRae, Chairperson, Delaware Public Service Commission concerning the refusal of the NRG to publish the magnitude of their poisonous pollution of Delaware and its citizens.

In my letter to you of 2 March 2007, I brought to your attention the variety of serious health hazards of Delaware's power plants published by *Clear the Air*, particularly the "soot emissions that cause dozens of premature deaths in Delaware every year".

Delaware has one of the worst infant mortality rates in the nation, ranking 40th among the 50 states. Delaware ranks 37th among the 50 states in overall health status (*Health Care State Rankings 2006*, Morgan Quinto Press, enclosed). See <http://www.violence.de/politics.shtml>. Delaware is an unhealthy and unsafe state for the rearing of children where Delaware also has the distinction of ranking 18th as the most dangerous state of the union, enclosed.
<http://www.morganquitno.com/elec/44w1health6.htm>
<http://www.morganquitno.com/elec/43Pdang7.htm>

The State Legislature must establish an emission particulate pollution that does not exceed 12 micrograms per cubic meter, as recommended by *The American Journal of Respiratory and Critical Care Medicine*, which is not possible when the NRG refuses to disclose the level of its poisonous emissions, a standard that the federal government should adopt.

Al Gore in his testimony before the Congress stated: "This is not a normal time. We are facing a planetary emergency," Gore said in the afternoon Senate hearing. "I'm fully-aware that that phrase sounds shrill to many people's ears. But it is accurate"; and recommended an immediate freeze on coal fired power generating plants (Farenholdt, *Gore Challenges Congress on Climate*, WP 3/22/07).

The NRG and the nation's coal fired power generating plants must be held accountable for the harm and health injury that they are inflicting, particularly upon infants and children. In this regard, I am again requesting that you rescind the "tax credit eligibility" that you recommended to the DOE, as being "clearly consistent with local, state and national public policy in any number of aspects".

The staggering health injuries and costs perpetrated by the coal/oil industries, which are not borne by them, are clearly contrary to the "local, state and national public policy " objectives. Health has priority over the profit margins of corporations and should be incorporated into law.

I urge you to give new priorities and considerations to the health of our citizens, nation and particularly the well-being of our infants and children.

Sincerely,

James W. Prescott, Ph.D.

Cc: Arnetta McRae
Joan Deaver
Alan Muller
Trish Vernon

The 14th Annual Most Dangerous State Award:

Nevada Stays on "Top"

ALPHA ORDER

07 RANK	STATE	SUM	06 RANK	CHANGE
17	Alabama	6.78	18	-1
2	Alaska	23.05	9	-2
3	Arizona	34.66	4	-1
15	Arkansas	10.79	16	-2
9	California	17.63	10	-1
22	Colorado	-1.53	32	10
40	Connecticut	-37.64	39	1
18	Delaware	6.88	24	-6
8	Florida	21.06	7	1
20	Georgia	5.30	13	-7
28	Hawaii	-16.17	26	2
39	Idaho	37.21	40	-1
21	Illinois	2.27	19	2
25	Indiana	-14.44	28	-3
43	Iowa	-42.78	43	0
27	Kansas	-15.64	25	-2
34	Kentucky	-27.00	33	1
19	Louisiana	17.35	9	-10
48	Maine	-61.37	49	-1
4	Maryland	31.50	5	-1
30	Massachusetts	-21.77	30	0
11	Michigan	16.55	12	-1
32	Minnesota	-25.93	35	-3
24	Mississippi	-7.85	21	-3
19	Missouri	5.59	20	-1
44	Montana	-44.74	45	-1
37	Nebraska	-32.39	34	3
1	Nevada	58.11	1	0
47	New Hampshire	-60.85	47	0
30	New Jersey	-26.94	32	1
2	New Mexico	34.85	3	-1
31	New York	-25.76	31	0
16	North Carolina	8.33	17	-1
36	North Dakota	31.50	36	0
23	Ohio	-1.92	23	0
15	Oklahoma	9.44	14	1
29	Oregon	-18.13	27	2
26	Pennsylvania	15.05	29	-3
35	Rhode Island	-30.22	38	-3
6	South Carolina	31.50	6	0
45	South Dakota	-48.43	45	0
8	Tennessee	31.79	8	0
12	Texas	13.85	11	1
38	Utah	-32.43	37	1
49	Vermont	-62.33	48	1
36	Virginia	-31.85	37	-1
14	Washington	9.37	16	-2
41	West Virginia	-37.87	41	0
42	Wisconsin	-42.11	44	-2
12	Wyoming	30.89	28	-16

RANK ORDER

07 RANK	STATE	SUM	06 RANK	CHANGE
1	Nevada	58.11	1	0
2	New Mexico	34.85	3	-1
3	Arizona	34.66	4	-1
4	Kentucky	37.21	5	-1
5	Tennessee	31.79	8	-3
6	South Carolina	31.50	6	0
7	Alaska	23.05	9	-2
8	Florida	21.06	7	1
9	California	17.63	10	-1
10	Colorado	-1.53	32	22
11	Michigan	16.55	12	-1
12	Texas	13.85	11	1
13	Arkansas	10.79	15	-2
14	Washington	9.37	16	-2
15	Oklahoma	9.44	14	1
16	North Carolina	8.33	17	-1
17	Alabama	6.78	18	-1
18	Delaware	6.88	24	-6
19	Missouri	5.59	20	-1
20	Georgia	5.30	13	-7
21	Illinois	2.27	19	2
22	Colorado	-1.53	32	10
23	Ohio	-1.92	23	0
24	Massachusetts	-7.85	21	-3
25	Indiana	-14.44	28	-3
26	Pennsylvania	15.05	29	-3
27	Kansas	-15.64	25	-2
28	Hawaii	-16.17	26	2
29	Oregon	-18.13	27	2
30	Massachusetts	-21.77	30	0
31	New York	-25.76	31	0
32	Minnesota	-25.93	35	-3
33	New Jersey	-26.94	32	1
34	Kentucky	37.21	33	1
35	Rhode Island	-30.22	38	-3
36	Virginia	-31.85	37	-1
37	Nebraska	-32.39	34	3
38	Utah	-32.43	37	1
39	Idaho	-37.21	40	-1
40	Oregon	-37.87	39	1
41	West Virginia	-37.87	41	0
42	Wyoming	-30.89	28	-16
43	Iowa	-42.78	43	0
44	Montana	-44.74	45	-1
45	South Dakota	-48.43	45	0
46	Wyoming	-30.89	28	-16
47	New Hampshire	-60.85	47	0
48	Maine	-61.37	49	-1
49	Vermont	-62.33	48	1
50	Wyoming	-30.89	28	-16

Source: Morgan Quitno Press

Ray Querey Comment – March 23, 2007

From: rquerey@aol.com [mailto:rquerey@aol.com]

Sent: Fri 3/23/2007 9:02 AM

To: Nickerson Karen J (DOS)

Subject: new plants

NO NEW PLANTS.

RAY QUEREY

2 LONGFORD CT

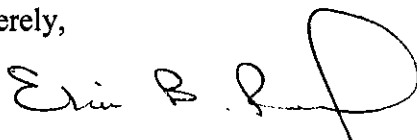
WILMINGTON DE 19808

3/20/07

To Whom It May Concern:

In response to a request for new electric power in Delaware, I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's IGCC bid. We do not have to be the guinea pigs for untested, unproven CO₂ underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. Thus, I support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin B. Ruff". The signature is fluid and cursive, with a large loop at the end.

RECEIVED
07 MAR 27 AM 11:34
DELAWARE P.S.C.

3/20/07

To Whom It May Concern:

In response to a request for new electric power in Delaware, I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's IGCC bid. We do not have to be the guinea pigs for untested, unproven CO₂ underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. Thus, I support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,

Ceanna Shannon

RECEIVED
07 MAR 23 AM 11:09
DELAWARE P.S.C.

Mike Short Comment – March 23, 2007

From: Mike Short [mailto:imageunseen@yahoo.com]
Sent: Friday, March 23, 2007 12:10 PM
To: Nickerson Karen J (DOS)
Subject: Delmarva Power RFP

Dear Karen and the PSC,

I am writing to show my support for the Bluewater proposal to supply energy for Delaware. You have a common sense decision to make. Listen to the public, the people you are supposed to serve, hence the name, or listen to the group of people that refuse to cooperate and are currently hurting thousands of Delawareans by polluting our air. NRG does not deserve another contract in Delaware. They have constantly manipulated the unions our politicians and our public to try to get their way. Thankfully only one of those groups has had enough sense to take the bait.

Our health is at stake. I live in the shadow of the NRG's Indian River Power Plant and some of my family have had health problem because of it. You can continue to choose an untested fossil fuel source of energy or a reliable renewable energy source. It is up to you and our lungs are depending on your decision. Do the right thing.

Thanks for your time,

Mike Short

3/20/07

To Whom It May Concern:

In response to a request for new electric power in Delaware, I strongly feel that the best option for our state is wind power. Delaware does not have to accept a new chemical plant in the form of NRG's Integrated Gasification Combined Cycle bid. We do not have to be the guinea pigs for untested and unproven CO₂ underground sequestration. Unlike many other states, we have the ability to diversify our resources with clean, price-stable offshore wind. This could be an incredible opportunity to create a cleaner environmental future for ourselves, our children, and our communities. There are enormous opportunities in wind power, and I want the state of Delaware to capture them. Thus, I strongly support the Bluewater Wind bid and hope that you will take into consideration my opinion on this important issue.

Sincerely,



Ryan M. Silberstein

RECEIVED
07 MAR 23 AM 11:09
DELAWARE P.S.C.

Wind power seems like the best
environmental and long term economic
solution.

Lisa Smith Comment - March 28, 2007

From: ALS Schwartz [<mailto:smithschwartz@comcast.net>]
Sent: Wednesday, March 28, 2007 10:14 PM
To: Nickerson Karen J (DOS)
Subject: support for wind power

To whom it may concern,

I am emailing you to express my support of wind power and my overwhelming concern about our continued reliance on coal generated electricity. I believe that global warming is happening, that the PSC and other state administrators and law makers have the power to help stop emitting the harmful greenhouse gasses that are a by-product of coal generate electricity. Additionally, I believe that the technology of harnessing the wind for power is more tried and true than any coal plant update -- no matter how state of the art.

For my health, for the health of my children and for the health of our planet -- please help Delaware to begin using wind power.

Thank you for your consideration,

Lisa Smith
32907 Ocean Bluff Drive
Lewes, DE 19958

Steph Smith Comment – March 21, 2007

From: StephSmith1000@aol.com [mailto:StephSmith1000@aol.com]

Sent: Wednesday, March 21, 2007 3:43 PM

To: Davis Jennifer (OMB); Larson Russell T (LegHall); Smisson Charlie T. (DNREC); Nickerson Karen J (DOS); senator@biden.senate.gov; Feedback (MailBox Resources); Bunting George (LegHall); gsimpson@udel.edu; Booth Joseph (LegHall); Hocker Gerald (LegHall)

Subject: Alternative Energy-PRO WIND FARMS

Dear Loyal Servers of your Constituents,

I have read the initial surveys that the majority of those polled in Sussex County and Delaware approve of exploring alternate sources of power from wind farms. I am one of them. I also see this effort as accepting the inevitable instead of delaying it. At this point all well-read citizens are at least aware of the climate crisis and the deterioration of the places we so dearly love. **Be part of that positive change, put yourself in the category of the front-runner for this change. A beautiful state like Delaware deserves smart, innovative, and forward-thinking choices and government to back it up.**

I support Wind Farms!

Please represent me well.

Steph Smith

Milton, DE

Shannon Sugrue Comment – March 23, 2007

From: shannonsugrue@comcast.net [mailto:shannonsugrue@comcast.net]

Sent: Friday, March 23, 2007 1:44 PM

To: Nickerson Karen J (DOS)

Subject: Please read

Dear Ms. Nickerson,

I am writing this to plead with you to please give Wind Power a chance in our state. I live in Rehoboth Beach and I have seen the real impacts of the pollution from the Indian River Power Plant. I have two young children (ages 8 and 10) and too many of their friends have asthma. Another friend who just moved here saw a doctor after half of her face swelled up because of repeated extreme ear infections. When she asked the doctor why she was all of the sudden getting these infections, he told her that the "air is different here" and that she could be reacting to pollutants. My own doctor has encouraged me to get prevenative tests because he has seen too many women under 40 with aggressive cancers. When I asked my doctor if the high cancer rate could have anything to do with where we lived he said that 10 years ago he would have said "no", but had to admit that there was something scary happening in our area. My doctor admitted that a pathologist that just moved to our area told him she was shocked by the high rate and aggressive nature of cancers in our area.

Out of concern for my children I am very concerned about the toxic emissions from the Indian River Power Plant. Though I was somewhat relieved when DNREC finally required the power plant to clean up this past fall, I was enraged that NRG is appealing those regulations! Why would our state give this company any further stake in our future?!? Why would we choose any type of power that involved ANY toxic emissions when we have a choice to have NO toxic emissions?? Our state needs to make an effort towards clean energy. Our state is so fortunate that we have the option to have a successful wind farm off of our coast! It would be irresponsible to turn our back on this opportunity. Out of all three of the proposals before the Public Service Commission, Wind Power is the only option. Wind Power is the only option because it will not emit any toxic chemicals into our environment. Wind Power is the only option because it will free us from our dependance on fossil fuels that are sure to become more expensive in the future. Wind Power is the only option because it offers our state the possibility to one day sell clean energy to other states for a profit.

My children deserve to breathe clean air. We all know that energy costs are going up. I would gladly pay more for energy that is leading our state in the right direction - towards renewable energy and freedom from fossil fuels! If energy costs increase to get wind power on it's feet, our family would consider this increase an investment in our children's and our state's future!

Our state has been horribly polluted for decades in the name of affordable power. It is time our state cared more for it's people than it's industry. I feel like my children's future is literally in your hands. Please choose Wind Power for my children and for all of the people in our state.

Sincerely,

Shannon Sugrue

200 West Side Drive

Rehoboth Beach, DE. 19971

shannonsugrue@comcast.net

RECEIVED
07 MAR 22 AM 11:43
DELAWARE P.S.C.
EPC.COM

A black and white photograph of a bird, possibly a heron or egret, standing in a marshy area. The bird is positioned in the center-right of the frame, facing left. It has long legs and a long neck. The background consists of tall, dark grasses and a body of water with ripples. The lighting is dramatic, with the bird's body and the grasses in the foreground being dark, while the water and the sky are lighter. The overall mood is serene and naturalistic.

I'M ALL FOR THE WIND TURBINES FARM OFF SHORE.
I HAVE READ ABOUT THE CHINESE HAVING THEM AND
PROVIDING POWER FOR WHOLE CITIES WITH LITTLE ON
NO USE OF FOSSIL FUEL ,THAT MEANS NO EMISSIONS
AND ALSO NO CARBON DIOXIDE IN TO THE AIR .
A STEP IN THE RIGHT DIRECTION FOR OUR FAMILIES &
GRAND CHILDREN:

JUST MAYBE IT WILL SHOW THAT THE NEED FOR OFF SHORE OIL WELLS IN OUR AREA ARE NOT NEEDED. THERE IS MORE CHANCE OF OIL SPILLS FROM THEM THAN FROM WIND TURBINES.

AS FAR AS BEING AN EYE SORE , I CAN'T SEE THEM BEING THAT WHEN THEY ARE MILES OFFSHORE THE BENEFITS WILL OUT WEIGH ANY COMPLAINTS OF BOATERS 20 MILES OFF SHORE.

YOURS TRULY
FRANK W THAMM

THEY ASKED WHAT HE HAD TO SAY
THERE IS NO CHANCE OF MY BEING KILLED IN A
SHAKE OR WETTER IN OUR VERY VINEYARD
TODAY WE WILL BE HERE WITH THE SEEDS OF
LIFE

Chad Tolman Comment – March 29, 2007

From: Tolman Chad [mailto:ctolman@UDel.Edu]

Sent: Thursday, March 29, 2007 7:11 AM

To: Nickerson Karen J (DOS)

Cc: Hughes Evan; Cherry Philip J. (DNREC); Smisson Charlie T. (DNREC); Walling Lee Ann (Governor); Davis Jennifer (OMB); Russel.Larson@state.de.us

Subject: COMMENTS FROM C3SA ON EVALUATIONS OF BIDS

Dear Ms. Nickerson,

My apologies for failing to attach the documents to my email to you yesterday. I have now attached the two documents, the first as a Word file and the second in PDF format. The first is titled, **C3SA COMMENTS FOR THE PSC ON EVALUATIONS OF THE BIDS IN RESPONSE TO THE DELMARVA RFP**, and the second consists of letters of Dec. 12, 2006 and Feb. 21, 2007 from Jack Markell to the PSC, which I refer to in the first. Please send copies of the two documents to Bruce Burcat and to each of the PSC Commissioners, and post them on the PSC web site. Thank you.

Sincerely,

Chad A. Tolman

Coalition for Climate Change Study and Action (C3SA)

C3SA COMMENTS FOR THE PSC ON EVALUATIONS OF THE BIDS IN RESPONSE TO THE DELMARVA RFP

Chad A. Tolman and J. Douglas Druliner March 18, 2007

We are scientists and members of the Coalition for Climate Change Study and Action (C3SA), an interdenominational group concerned about the impacts that continuing greenhouse gas emissions may have on earth's climate, human society, and wildlife. Electrical power generation, which till now has relied primarily on burning fossil fuels, is producing billions of tons of CO₂ each year, and is a major contributor to increasing CO₂ emissions and global warming.

Now that Delmarva Power has bids from three companies representing different electricity generating technologies, and we have seen the evaluations published by Delmarvaⁱ and the 'Independent Consultant'ⁱⁱ representing the four state agencies, it is clear that the process for determining our state's electrical energy future is deeply flawed, for a number of reasons.

1. The many comments made by citizens and environmental groups in previous hearings and in hundreds of letters to the Governor and state agencies—urging that much more weight be given to reducing emissions of GHGs and other pollutants--have been largely ignored, and have had very little effect on the rating system used to evaluate the bids. These two aspects of the bids--of such great importance to the citizens of our state--were given a maximum total of only 8 points out of 100.
2. Having one 'Independent Consultant' (IC) representing all four state agencies, rather than getting independent evaluations from each of them—especially from DNREC—means that environmental concerns have been largely ignored. After all, "It's the mission of the Delaware Department of Natural Resources and Environmental Control to protect and manage the state's vital natural resources, protect public health and safety, provide quality outdoor recreation and to serve and educate the citizens of the First State about the wise use, conservation and enhancement of Delaware's Environment."ⁱⁱⁱ The only thoughtful comments we have heard from anyone in state government are in the two letters submitted by Jack Markell, the State Treasurer, in letters to the PSC dated Dec. 12, 2006 and Feb. 21, 2007 (attached to email message).
3. The public didn't get two really independent evaluations of the points to be assigned to the two factors given the highest weights—price and price stability--since Delmarva's consultant (ICF) and the IC for the state agencies pretty much agreed on the inputs to the computer model before it was run. Not surprisingly, the results were very similar.
4. Because of the importance of price and price stability, the assumptions made about the future costs of fossil fuels and future penalties for releasing CO₂ into the atmosphere naturally dominate the outcome of the bid comparisons. To a

person trained in science, the precision of the projected prices for electricity, in 2005 dollars, levelized over a 31-year period from 2007 to 2038 (e.g., \$85.40 per MWh for the market price estimated by the IC and \$86.40 estimated by Delmarva)^{iv}—is quite remarkable, especially since the price of gas, the most important factor in determining the market price, is probably not known for 2038 to within a factor of 3 or maybe even a factor of 10! In a shorter period, from 1976 to 2005, the U.S. price of natural gas increased by a factor of 15,^v then doubled again in 2005 as a result of Hurricanes Katrina and Rita, reaching a peak of over \$14/MMBtu.^{vi} In fact, the sudden rise in gas prices was a major reason that SOS customers' electricity rates jumped up nearly 60% on May 1, 2006. Yet Delmarva would have us believe that the average price of natural gas (estimated at \$7.40 in 2005\$/MMBtu)^{vii} will be basically the same in 31 years (allowing for some inflation) as it is today! The expected levelized penalty for CO2 emissions over the same 31-year period is estimated to be only \$12.10 per ton. Synapse Energy Economics estimates that if U.S. companies had to comply with the Kyoto Protocol, the cost of emitting CO2 would be \$20 to \$50/ton^{viii} - and Kyoto is much less demanding than the kind of CO2 emission reductions necessary to stabilize climate before serious damage is done. On March 14, 2007, economist Charles Komanoff of the Carbon Tax Center, in a briefing in the Dirksen Senate Office Building, argued for a carbon tax starting at \$47 per ton of carbon,^{ix} and increasing by that amount annually to a total of \$470/ton of carbon after 10 years.^x While the prices of carbon emissions in the future are very uncertain, it is clear that the \$12.10 per ton of CO2 figure is unrealistically low and that carbon costs are likely to go up substantially with time, as the damages caused by climate change become more apparent, and serious efforts are made to reduce GHG emissions.

Delmarva says it can buy cheaper power from the south and west, once new big transmission lines are put in. And how will that power be generated? Delmarva doesn't say, but it will probably be from big, dirty pulverized coal plants pouring CO2 and other pollutants into the atmosphere we share. We already complain about how difficult it is to meet National Air Quality Standards because of pollution blowing in from the south and west, and the greenhouse effect will be increased just as much by CO2 generated in Ohio or West Virginia as from CO2 generated in Delaware. Passing the buck is not the answer.

Delaware has a Renewable Energy Portfolio Standard, requiring that 10% of the electricity sold in the state come from renewable energy sources by 2019. That percentage is going to increase as neighboring states go for more aggressive standards. Where is Delaware going to get its renewable energy? Delaware is also party to a multistate Regional Greenhouse Gas Initiative, which will have a trading system and CO2 emissions caps that will decrease with time. How does Delmarva propose to do that?

Whatever Delaware decides to do about adding new electrical generating capacity, it should be part of a long-range plan with timelines and binding targets for reducing CO2 and other GHG emissions substantially and soon, before serious and irreversible damage is done to the climate system. California has adopted a goal of

reducing carbon emissions to 1990 levels by 2020 (a 25% reduction) and then reducing them by a further 80% by 2050.¹¹ Delaware, because of its low average elevation and the importance of tourism to its economy, is at least as vulnerable as California, and should do no less.

Finally, Delaware is blessed with an abundant renewable energy resource in the form of offshore wind—enough to supply all of our own needs for electricity, space heating, and light vehicle transportation.¹² The technology is proven and is growing worldwide by 30%/year; Denmark already gets 20% of its power from wind, most of it offshore. Our state has been hard hit by the announcement that Chrysler will probably soon be closing its auto assembly plant, which had the misfortune to be making energy-inefficient SUVs that customers no longer want. We could be the first in the United States to install significant offshore wind power and start a major wind turbine manufacturing industry right here to supply turbines to wind farms all up the East Coast. A recent study by the University of Delaware shows that the coast from Cape Cod to Cape Hatteras can produce enough to supply most of the energy needed by all of the coastal states from Massachusetts to North Carolina.¹³ We could play a leading role in starting substantial U.S. reductions in GHG emissions—something that may be required before China and India do the same. We have a bid to begin. Let's do it.

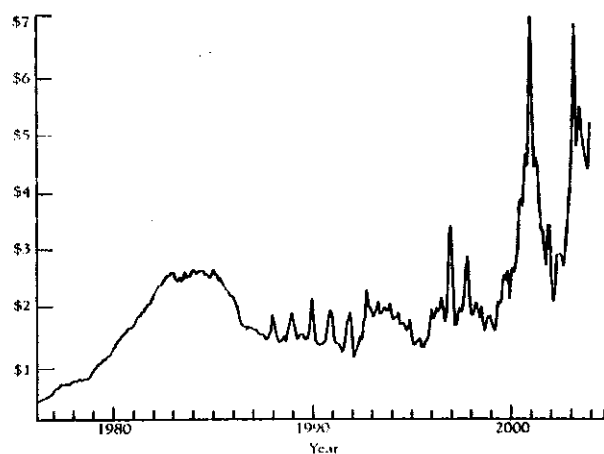


Figure 1. Natural gas prices (\$/MMBtu) from 1976 to early 2005, from Ref. 5.

REFERENCES

ⁱ <http://www.state.de.us/delpsc/electric/irp/dpl022107bideval.pdf>

ⁱⁱ <http://www.state.de.us/delpsc/electric/irp/state022107bideval.pdf>

ⁱⁱⁱ <http://www.dnrec.delaware.gov/aboutagency.shtml>

^{iv} Ref. 2 Tables 3 and 4 on p. 36.

^v K.S. Deffeyes, **Beyond Oil – The View from Hubbert's Peak**, Hill and Wang, New York, 2005, P. 32. (See Figure 1)

^{vi} **Hurricane Impacts on the U.S. Oil and Natural Gas Markets, *EIA Report*, at:**
http://tonto.eia.doe.gov/oog/special/eia1_katrina.html

^{vii} Ref. 1, p. 20.

^{viii} Susan Moran, **Coal Rush! With Carbon Caps on the Horizon, U.S. Utilities are Racing to Build Dozens of Antiquated Coal-Fired Power Plants**, *World Watch*, Vol. 20, No. 1, January/February 2007, p. 10.

^{ix} \$47 per ton of carbon is \$172 per ton of CO₂. The multiplier of 44/12 is the ratio of the molecular weight of CO₂ to the atomic weight of carbon.

^x Charles Komanoff and Dan Rosenblum, **Why Carbon Taxes**, Slide 19 of 31, at:
<http://www.carbontax.org/>

¹¹ **Gov. Schwarzenegger Signs Landmark Legislation to Reduce Greenhouse Gas Emissions**, State of California, Office of the Governor, Press Release, 9/27/06. At:
<http://gov.ca.gov/index.php?/press-release/4111>

¹² A. Dhanju et al., **Assessment of Delaware Offshore Wind Power**, at:
<http://www.ocean.udel.edu/windpower/docs/BurDhanWhit05-MAST667-FINAL.pdf>

¹³ **UDaily, Researchers find Substantial Wind Resources off Mid-Atlantic Coast**, at:
<http://www.udel.edu/PR/UDaily/2007/feb/wind020107.html>



STATE OF DELAWARE
OFFICE OF STATE TREASURER
820 SILVER LAKE BOULEVARD, SUITE 100
DOVER, DE 19904

JACK A. MARKELL
STATE TREASURER

PHONE: 302-672-6700
FAX: 739-6635

December 12, 2006

Public Service Commission
861 Silver Lake Blvd, Suite 100
Dover, DE 19904

Re: PSC Orders 7066 and 7081

To The Commission:

I understand that you will shortly be holding hearings in connection with the implementation of House Bill 6 (Electric Utility Retail Customer Supply Act of 2006 or EURCSA), specifically related to the Kempton/Firestone petition for rehearing and reconsideration. This legislation is of particular interest to me, following up on my letter of February 21, 2006 to Bruce Burcat (attached).

I further understand that EURCSA aims to stabilize pricing of electricity for Delaware customers in both the short and long terms. More specifically, EURCSA requires that DP&L issue a Request for Proposal (RFP) for long term supply and that the criteria include cost-effectiveness of the project in producing energy price stability, reductions in environmental impact, and the benefits of adopting new and emerging technologies, among other factors.

As State Treasurer, I certainly believe that having more stable pricing and less environmental impact are worthy goals.

That being said, for two reasons, I am concerned that the PSC's order may be inconsistent with the goals of EURCSA.

First, the PSC ordered Delmarva to evaluate bids with price (as opposed to price stability) given 33 points out of 100. Obviously, all of us seek the lowest possible prices; at the same time, EURCSA specifically mentions the importance of price stability. Price stability is only awarded 20 points out of 100. That relatively minor weighting appears to be inconsistent with the language in EURCSA.

Second, environmental impact in the form of greenhouse gases is awarded only 4 points.

The basis of my concern related to this point is that the US Congress may well have before it several billsⁱ that would either restrict or economically penalize power plants that emit CO₂. The incoming chairs of three of the most important committees dealing with energy and climate change have said "When the 110th Congress begins in January, we pledge to work to pass an effective system of mandatory limits on greenhouse gases."ⁱⁱ Businesses in many states are planning power production accordingly.ⁱⁱⁱ

To the same point, a recent analysis by the Department of the Treasury in the United Kingdom estimates the economic cost of climate change could be as much as 20% of GNP.^{iv} It is logical to conclude that, if they agree with this analysis, governments around the world will be highly motivated to penalize relevant facilities.

Should that happen, Delaware ratepayers could well bear the burden of these costs over a long period of time. In addition to the financial costs, Delaware is a coastal state and thus is especially vulnerable to climate change. To minimize this factor in the evaluation of new power is not looking forward to taking care of our economy and our state. These costs, whether in electricity costs or costs on other sectors, may well last beyond the initial contract period of the RFP.

I am concerned that the PSC has taken a bill that rightly looked to the longer-term future, but implemented it as an RFP that is based more on a short-term outlook. As a result, bidders may be encouraged to propose facilities that are lowest in "apparent cost", as it seems in today's business environment. I am concerned that early in the lifetime of these facilities, perhaps even before construction is completed, we will be in a business environment that places far higher penalties on certain emissions, thereby potentially raising significantly the long term price to consumers.

Due to the above considerations, in the upcoming re-evaluation of the RFP on December 19th, I urge the Commission and DNREC to consider: 1. Giving more points to the three main points of the EURSCA: price stability, reductions in environmental impact (especially greenhouse gas emissions), and advantages of new technology. 2. Taking a long-term view of cost-effectiveness, considering what may well be the business environment in which these facilities will operate, 3. Evaluating the bids on their effects over the life of the facilities, not just the bid contract period.

Thanks for your consideration of the points raised in this letter.

Sincerely,



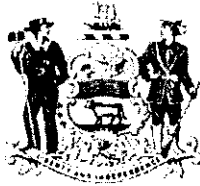
Jack Markell
Delaware State Treasurer

ⁱ For example, Rep. Waxman's Safe Climate Act (H.R. 5642) freezes U.S. greenhouse gas emissions in 2010. After 2020, it cuts emissions by roughly 5% per year. By 2050, emissions will be 80% lower than in 1990. Sen. Jeffords's bill (S. 3698) has similar requirements.

ⁱⁱ Letter from U.S. Senators Barbara Boxer (D-CA), Jeff Bingaman (D-NM) and Joseph Lieberman (I-CT) to President Bush, November 15, 2006. Available at <http://boxer.senate.gov/news/releases/record.cfm?id=265906>

ⁱⁱⁱ An informal poll of 30 utility and energy industry executives found that 4 out of 5 expected that, after Pres. Bush is no longer in office, "the U.S. would impose mandatory curbs on the emissions of carbon dioxide and other greenhouse gases" (Business Week, Dec 12, 2005).

^{iv} The Economics of Climate Change: The Stern Review. Nicholas Stern, Cabinet Office - HM Treasury. Cambridge University Press, The Edinburgh Building, Cambridge. Online at: http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/stern_review_report.cfm



STATE OF DELAWARE
OFFICE OF THE STATE TREASURER
THOMAS COLLINS BUILDING
540 S. DUPONT HIGHWAY, SUITE 4
DOVER, DELAWARE 19901

JACK A. MARKELL
STATE TREASURER

PHONE: (302) 744-1000
FAX: (302) 739-5635

February 21, 2006

Mr. Bruce Burcat
Public Service Commission
861 Silver Lake Blvd, Suite 100
Dover, DE 19904

Dear Bruce:

Thanks for taking the time to speak with me last week about issues surrounding the deregulation of electricity.

As you know, I have previously commented¹ on my disappointment, obviously shared by others, that the promise of competition, including lower prices, never materialized. I have previously urged that an investigation be conducted to connect the dots between the proposed 59% rate increase, Pepco's swelling profits (including an increase in dividend to shareholders announced just days before the announcement of the rate increase) and the lack of competition². But to address this serious problem, the State of Delaware must do more.

As a starting point, it will be important for the PSC to give the public a sense of whether it believes the increase³ in pricing of electricity is a short-term condition (for example, the impact of Hurricane Katrina on natural gas prices) or a long-term issue reflecting, in part, flaws with deregulation. I believe, in fact, that there may well be two long term issues – these flaws in deregulation and the fact that oil and gas prices may not be coming back down.

The answer to this question is critical because different policies will be needed to deal with short- or long-term conditions, and with regulatory as opposed to resource-price issues. Regardless of what problems may be caused or exacerbated by improper regulation or deregulation, the best way to deal with short-term price-increases may well be conservation and efficiency programs, as well as identifying programs that can provide additional assistance to the poor and small businesses; longer-term increases in the costs of current energy sources may require initiatives to facilitate the development of alternative energy supplies (including renewable energy sources). Moreover, if the pricing problem is a short-term problem, then addressing the issue through stiff re-regulation may actually exacerbate the lack of competition and may stifle the type of additional investment in generation capacity we should seek.

On the other hand, to the extent that the increases are more likely longer-term and if there seems to be little movement toward investments in additional generation capacity and ultimately lower prices, then there seems to be little compelling rationale for Delaware to stay with its deregulated regime. In that case, we would need to devise a system that provides reliable electricity at low prices while providing the type of regulatory environment where investment in

generation infrastructure would be attractive. I lay out some ways to start thinking about such a system in this letter, although considerably more analysis is required.

To whatever extent the problem is the state's current deregulation policy, however, it's clear that three strong initiatives are presently warranted: (1) initiatives to create Delaware-generated alternative/renewable energy sources; (2) conservation measures; and (3) the identification of programs to assist those who need it most.

Facilitating the Development of Renewable Energy Sources: The development of alternative energy sources, including renewable energy, will be an important vehicle for ratepayers to minimize their reliance on the current power suppliers. This is also important because Delaware has little resident natural resources for energy production, so we are a net energy importer. We should develop a new Energy Plan that includes the Delaware-based development of energy (including, for example, wind resources, solar and biomass). A few other states, such as Texas and California, have been successful in carefully crafting regulatory rules and incentives to attract the major wind power developers and enable them to install significant capacity. Understanding that renewable energies are still often more expensive than traditional types of electricity generation, it would be of value for the PSC to make recommendations about tax incentives and other utility-based programs that could be put in place to encourage the development of renewable energy sources. I understand, for example, that some utilities allow customers to designate that some portion of their energy actually come from renewable sources, even if there is a surcharge for the customer.

In addition, it would be helpful for the PSC to assess whether Delaware's regulations (or PJM rules) in any way create barriers to the development of alternative and renewable energy sources. In some states, there are fees, stand-by charges, extra transmission charges and other barriers to renewable energy sources. In some cases, because these sources of energy depend on nature (like sun or wind), they are deemed to be unreliable and as a result certain stand-by charges and penalties (including penalties for power deliveries that vary from scheduled amounts) are imposed, thereby driving up the costs of these forms of electricity generation, making them less competitive. It would be helpful to know whether any of these issues apply in Delaware (including through any PJM rules). It would also be helpful to know whether there is a difference in tax treatment in Delaware for conventional power generation, as compared to renewable energy sources.

Promoting Conservation: Customers should have the ability to save real money by instituting serious conservation (demand management) initiatives. Some specific ideas include the following⁴:

- Implement a reward program for conservation efforts by residential and potentially business customers. An example could include a 20/20 reward structure, as has been implemented elsewhere, whereby consumers who reduce their energy use by 20% in a given month, as compared to the same month in the previous year, receive a 20% credit on their bill. Can the PSC provide some estimates of the potential benefits and costs of such a program in Delaware?
- Reduce energy use in major state buildings by 20 % compared to the previous year and challenge counties and municipalities and other public bodies to do the same. This would build on initiatives the Governor has previously taken, including those announced in October, 2005.

- Build on the Governor's encouragement of the use of Energy Star appliances by directing utilities to provide rebates to consumers who buy them. These appliances tend to be more costly than others, so many consumers tend not to make these investments. However, energy savings, over a long period of time, can make these good investments and up-front rebates will encourage consumers to make these purchases.
- Implement "time of day" charges so that customers can benefit from lower prices by using their electricity at off-peak times. It would be helpful for the PSC to explain the constraints which have limited the use of time of day charges to date.
- Improve energy efficiency building standards. The main tweaks to the building codes in other states have involved tightening the duct work in buildings (where lots of air conditioning and heat escape, causing inefficiencies) and reducing the amount of solar heat that radiates into the home through the attic and windows.
- Implement a massive public education campaign. The idea simply is to educate consumers about energy conservation and efficiency and to arm them with simple things that they can do to reduce their energy bills. It will be increasingly important for members of the public to understand exactly how much they end up paying for items like leaving the lights on, running their dishwasher and washing machine and the like. Currently, there is little of this type of price transparency when it comes to residential electric usage. For any public education program to work, it has to be very public and repeated tirelessly until it is effective.

Helping those who need it most: Of course, Delawareans have benefited significantly over the last several years with no increase in Delmarva's customer rates (notwithstanding these caps, Pepco Holdings has experienced excellent financial performance in recent years). Now, customers are expected to pay huge increases as these caps come off, but the question is raised: What happens to those who can't afford significantly higher prices, like hospitals, school districts, non-profits whose budgets are being cut by the federal budget; small businesses; and those with low incomes? The average amount collected per bill for low-income programs (like LIHEAP) in Delaware is only 10% of New Jersey's and 20% of Maryland's. It would be helpful for the PSC to provide some estimates of what it would take in aggregate dollars to ensure that those who need it most can take care of their basic utility needs. That analysis should also reflect the fact that the best way to help low-income residents in the long-term may well be to target investments in energy efficiency, so the government can minimize the extent to which it is paying for utility bills.

The areas addressed above – development of alternative energy sources, conservation and helping those who need it most – need to be addressed whatever the reason for the underlying problem that led to the huge increase in rates.

Beyond these fixes, however, the state must begin to consider the nature of longer term changes to our regulatory structure should the factors that led to the huge increase in rates not be quickly mitigated.

Imposing Limits on Rate Increases: One area that should be considered is related to the imposition of limits that would link future rate increases to the increase in cost of the underlying inputs.

Increased Transparency: One aspect of this reform would be the mandating of transparency in the bidding process, so that consumers can have confidence that the bids themselves are credible. I believe it will be of real value for the PSC to publicize both the names and prices of the winning bidders as well as the nature of the energy sources (that is, nuclear, coal, oil, natural gas, etc.). While I understand that the bidders⁵ are hesitant to have their bids made public for competitive reasons, the public's right to know should come first (particularly related to finding out the extent to which Pepco Holdings' Delaware utility Delmarva Power⁶ is relying on its unregulated subsidiary, Conectiv Energy, to generate power supply for Delaware customers).

Marginal vs. Clearing Pricing: Beyond transparency in bidding, the PSC should consider the advantages and disadvantages of ensuring that rates are allowed to rise only to a level consistent with the increase in input costs and not to the "clearing price." One of the major changes initiated by deregulation is that, even the lowest cost producers are paid the much higher "clearing price," that is, the price paid to the very highest cost producer that is needed to provide even one megawatt at a given time. In 2004 in Delaware, 34% of power generation was from natural gas (which is very high cost and whose price has increased much faster than coal), but 100% of the power generation has been paid for at the "clearing price" typically set by the least efficient natural gas power plant that is online at a given time. As a result of this change, producers of low cost power are reaping huge financial returns.

I understand that some people have represented that fixing this "clearing price" mechanism is dangerous because it would discourage the construction of additional generating facilities. However, others argue that fundamental financing and institutional constraints make it highly unlikely that unregulated generators will construct new facilities notwithstanding even more economic incentives including PJM's proposal to the Federal Energy Regulatory Commission for a large "Reliability Pricing Model" capacity surcharge that would raise customer rates for Delawareans even further. And in any case, the next proposal addresses incentives for generators.

Guaranteeing a Return on Investment for Power Generators: Should the state decide to limit the extent to which rates can be increased as outlined above (or through some other mechanism), it must recognize the trade-off it is imposing on suppliers⁷. Profit potential (and risks) would be mitigated, so utilities should be entitled to some guarantee on investment in order to provide for a return to shareholders and for reinvestment in infrastructure.

Certainly, there may be a large number of options to consider when it comes to dealing with the long-term goal of providing for reliable power at affordable prices in a way that is profitable for the power companies. Negotiating among these options will require the best possible alignment of interests among the major players as much as possible. The players are: a) residential customers, b) small and mid-sized business customers, c) Pepco Holdings shareholders, and d) power suppliers aside from Pepco's Conectiv Energy. Obviously, these entities have many goals which may conflict with each other. But all parties probably recognize that the current situation (i.e. significant fluctuation in electricity costs and the existence of an unregulated monopoly) is not sustainable. Furthermore, there seem to be a number of shared goals:

- Keep the lights on
- Attain a diversified set of potential power suppliers

- Predictability in pricing (as low as possible) and in the earnings stream for Pepco Holdings shareholders

I am hopeful that the parties will be brought together to negotiate a solution which is in the best interests of Delawareans and which will deliver reliable power at affordable and predictable prices. I also hope that this negotiation will be as transparent as possible, including opportunities for public input so that Delawareans have a meaningful chance to contribute to the dialogue.

Please let me know if I can provide clarification on any of these questions or suggestions. I look forward to your response to this letter.

Sincerely,

Jack Markell

Jack Markell
Delaware State Treasurer

¹ My previous comments were made on February 9.

² It will be important to get the PSC's guidance about why the competition that was supposed to have developed, keeping prices low, never materialized.

³ The proposed 59% increase represents approximately \$150 million in higher rates annually for residential customers, \$8 million for small commercial customers, \$56 million for mid-sized commercial customers, \$35 million for large commercial customers and \$173 million for a variety of other customers, including landlords, state office buildings and the like. As has been discussed at considerable length, Delawareans are stretched by cost increases in a number of areas and these utility charges are particularly burdensome. Governor Minner has already charged the PSC with examining the feasibility of deferring or phasing in the proposed increases. Others, including me, have made similar recommendations. Similarly, Governor Minner charged the PSC with examining the feasibility of requiring Delmarva to enter into long term supply contracts. In my comments on February 9, I also mentioned the potential value of having Delmarva enter into such contracts.

⁴ It would be helpful for the PSC to address which of these programs have already been implemented in Delaware

⁵ During December and January, the Public Service Commission took bids on generated power for the standard offer market price. Eleven bidders competed. Several bidders won (bidders actually bid on a variety of different customer classes and time of use categories) and the lowest winning bid across all categories is 59%. I understand that the Public Service Commission will shortly be releasing the names of the winning bidders.

⁶ Prior to deregulation, Delmarva Power owned generation facilities. After deregulation, Delmarva sold its generating capacity (i.e. Indian River plant and ownership interest in nuclear facilities at Salem and Oyster Creek). It will be important for the PSC to quantify the impact of Delmarva's decision to sell off its relatively low cost generating facilities and whether or not the proposed rate increase is higher than it might have been had those facilities not been sold. As part of this analysis, the PSC could provide additional helpful information by quantifying all of the components of the proposed 59% rate increase (the actual price increases of the inputs vs. the disposition of low cost generating facilities vs. the change from marginal pricing to "clearing price").

⁷ Before deregulation, suppliers were able to recover their investment in generating assets with a guaranteed return. That guarantee is no longer in place -- and as a result, financial results are far more likely to fluctuate significantly for power suppliers like Conectiv Energy (hence a significant financial risk for its parent Pepco Holdings). At a time when the marginal cost of the highest cost producer is high (as today), the low cost suppliers do very well. If margins get squeezed and prices come down, power suppliers have no guaranteed return (as they had before deregulation).

Dear Ms. Nickerson:

Enclosed find 3 documents: my testimony at the public hearing in Dover, 3/6, and testimony I could only partially complete on 3/12 in Georgetown because of time constraints, and a document citing scientific analysis our group has compiled citing the damaging health effects of burning fossil fuels. Would you please see to it that each member of the PSC receive a copy of each document submitted on behalf of Citizens for Clean Power and all Delawareans. Thank you so much for all your hard work on this issue.

Sincerely,
William F. Zak

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DELAWARE P.S.C.

AN OPEN LETTER TO PARENTS AND GRANDPARENTS CONCERNED ABOUT DELAWARE'S CHILDREN

Supplying Our Future Energy Needs: More Poisonous Coal or Whistling Wind?

Recently, NRG has placed two large ads in this paper extolling the merits of its bid for a new coal gasification unit at Indian River in preference to Bluewater's wind bid.

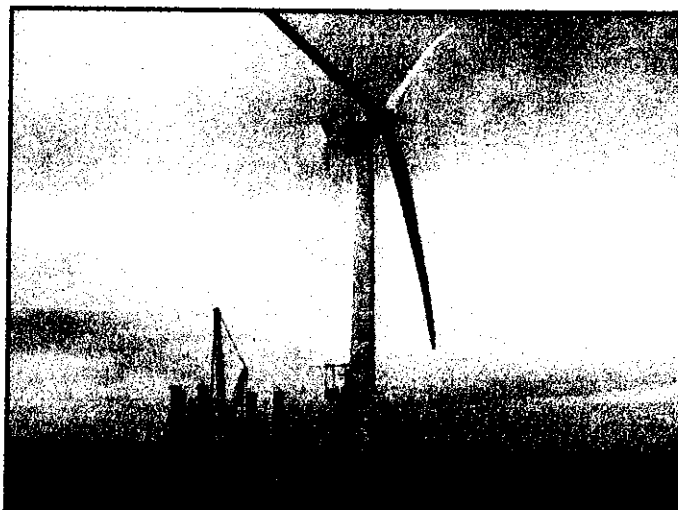
We believe that a wind farm barely visible six miles off the coast is the best choice for Delaware's future energy needs, offering long-term price stability and long overdue environmental and health improvements. Let's explore here the misinformation and half truths in NRG's ads.

NRG ads say nothing about improving the health of Delawareans, who will continue to be poisoned by an expanded coal plant. NRG offers no apology or regret for the enormous health care costs that the state's taxpayers pay to subsidize this corporation's profiteering; nor do they speak of reparations for the shortened lives and hundreds of millions of dollars in health-related costs that science has now shown that coal plants cause.

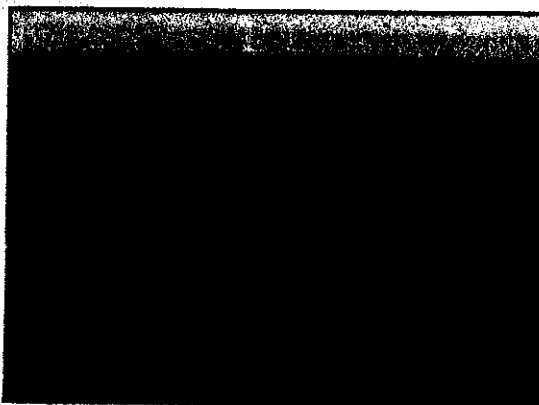
Coal gasification technology does represent a radical improvement in pollution control for generating electricity with coal, and were there no other choice available, we would accept it. But it should not be sold to the public as "clean coal." There is no such thing. **The new 560 mw unit will pump millions of pounds of toxins into our air annually**, roughly at the rate of a natural gas plant. Before DNREC recently imposed new regulations, NRG was unwilling to talk about decommissioning any portion of the old plant despite its age and substandard pollution controls; now they are suddenly promising to close two of the four units when a coal gasification unit comes on line. This is clearly more an attempt to win an edge in the competitive bids than the civically responsible gesture that it appears to be. In the new combined facility, **the total capacity at Indian River will have increased from 783 MW presently to 1199 MW--even if these two smaller units were to be closed.** If NRG were committed to cleaning up the environment, they wouldn't be trying to appeal the new pollution control regulations. **Even if DNREC's tighter regulations survive NRG's appeals, NRG and Edge Moor in Wilmington will still be the biggest polluters in the state by far, generating much more than half the state's entire industrial output, in fact.** Is NRG making this offer to minimize the devastating effects of childhood asthma, neurological impairment, AIDS, and respiratory death in infants (27% and 40% higher near old coal stacks) or to gain a business advantage?

Even more galling than NRG's refusal to face facts and the costs they should be shouldering for the damage they do is their claim to offer leadership in our battle against global warming, what they themselves call "the single

greatest challenge humanity" may have ever "faced." Just as we do not presently have any regulation imposing stricter limits on particulate emissions (though DNREC promises one), so the old facility at IR does not presently limit CO₂, the global warming and ocean acidification gas. **The technology for such controls on the new IGCC unit, while a possible future installation at the site,**



is not presently available commercially nor has NRG vowed to install it at the earliest opportunity or at their expense. They will do so only when required by law and if the cost for abatement is to be passed on to ratepayers, Jack Markell has concluded. Given that carbon taxes are likely to be in our future soon, too, so much for price stability under coal's leadership. **Moreover, NRG recently testified before the Public Service Commission that it would never be economically feasible to capture more than 60-65% of the CO₂ the new unit produces.** Nor is NRG willing to pin down projected costs for storage and sequestration. When a billion dollar IGCC unit has been built and we learn later how prohibitively expensive CO₂ controls and sequestration will be, what will happen? Does anyone imagine we will be able to close down such a facility because it cannot deliver this added benefit? Neither ratepayers nor the corporation will be willing to foot the bill.



Clean, renewable wind, by contrast, offers genuine price stability and healthier air with no costly surprises down the road. Since wind produces no CO₂ emissions, Delaware will be doing its part to begin addressing the global warming problem immediately and help prevent the mass ocean extinctions scientists predict within the century if CO₂ loading is not soon curtailed. NRG claims "to believe in wind power," but despite comparable estimates of project costs (900 million vs. NRG's 1 billion plus) NRG argues that wind farms are "extremely expensive" and insufficiently

reliable. Based on what evidence? Bluewater has declared that offshore wind turbines operating in European waters generate electricity 70-90% of the time and that Atlantic coastal waters have equal output capability based on its measurements. And a recent study by Stanford scientists lists the northeast Atlantic coast, including Delaware, among the areas with the greatest potential for wind energy production. In addition, when winds are strong oversupply can be fed into the grid to offset peak period lulls that might occur. In any case, should Bluewater's calculations be in error and their experiment prove an expensive failure, Delawareans will not be saddled with a massive bill for health and environmental consequences.

To hear NRG talk, one would think that a vote for wind in this instance would be a choice to do without electricity generated by coal. Not to worry. Under the best of circumstances our national over-reliance on coal will not be broken for decades. **Indeed, this wind farm will not even close down the old IR facility. It will simply cut down NRG's hopes to increase their profits by enlarging their coal footprint in Delaware rather than in some less economically favorable site.**

Let's help lead the nation by initiating a new industry, headquartered here, that can bring more jobs and economic well being to this state than more coal can. If wind should win the bid to proceed, before the first turbine appears, the project will have been reviewed by nearly 40 different federal, state and local agencies. We will not be promoting something blindly. Nor will we be alone: wind projects are currently under consideration or already initiated in New England and off the coast of Long Island and New Jersey.

In comparison to coal, what can be said against wind? Its many thumbnail sized toothpicks on the horizon unsightly? Turn around and imagine an IR facility at least twice its size belching smoke. For every tower you can count on the horizon, think of a child without an inhaler, an infant not dead from respiratory failure, a miner not buried alive, a mountain not blown to rubble. For every 1 or 2 birds killed annually by a turbine on a wind farm (that figure the finding of a recent environmental study in Denmark), think of the millions of birds and mammals being destroyed daily in mountain top obliteration.

Send your letters to the following deciding agencies by February 10:

Gov. Ruth Ann Minner c/o
mark.brainard@state.de.us.
DNREC: charlie.smisson@state.de.us
Jennifer.Davis@state.de.us
Russell.Larson@state.de.us
Karen.Nickerson@state.de.us

**** You must ask Ms. Nickerson to copy your letter for the other commissioners ****

Also contact your local legislators!
See the website: www.abetttersussex.com

William F. Zuk

On behalf of Citizens for Clean Power

Testimony in Georgetown 3/12/07

In an environment of great price inflation brought on in significant part by natural gas cost spikes, HB6 sought a bidding process that would favor new technologies going forward, fuel diversity and long-term price stability. High priced natural gas offers none of these things. Nor, unless published projections reported in the press are wildly inaccurate, will 177MW serve the state's future needs. Alternatively, accepting no bid simply allows entrenched fossil fuel interests to delay once again the development of clean renewable power generation. Reassurances from Connectiv's spokesperson touting their purchasing sophistication as a means of controlling future cost spikes should demand exceed the 177MW supply will not pass a laugh test. Where was that vaunted skill a year ago in the face of wildly escalating fuel costs? What's more, Connectiv's bid does not factor in the longer-term costs of carbon management, nor, as is done in Europe, the hidden health care and environmental costs arising from continuing to burn fossil fuels. Should Connectiv be allowed to calibrate predicted inflation in natural gas costs to predicted coal price increases? And why on earth should the PSC accept a natural gas bid that allows Connectiv to reset its costs after the permits have been issued? Talk about buying a pig in a poke.

The Citizens of Delaware don't need dubiously objective assessments from Connectiv's parent company (who also set most of the ground rules for the independent consultants' report) to determine the superior bid here: wind.

At a price very comparable to present residential rates, with no future costs for carbon management and price instability for fuel, a proven new technology (over 17,000 MW now generated world-wide) acceptable to 90 % of Delawareans polled can 1) nurture a new potential growth industry in the state; 2) reduce global warming and ocean acidification; 3) significantly reduce the deadly health effects and health care costs to taxpayers produced by burning fossil fuels; 4) improve water quality, fisheries, and agricultural yields. What's not to like? Denmark is so happy with its off-shore facilities that it now plans to provide 50% of the nation's electrical needs through expansion. The governor of Rhode Island has announced that his state will take full advantage of the ideal conditions off the Atlantic coast to supply 15% of that state's requirements in this fashion in 5 years. Long Island is in the first stages of offshore wind development and New Jersey's governor has a recommendation for a large pilot project on his desk. But we in Delaware, a small state, are in danger of being led by even smaller minds. What is DP&L afraid of: that it will become the new Ford or GM if it should let wind development get its foot in the door?

Though they would have us believe otherwise, DP&L's and the public interest are not always and necessarily identical. The Public Service Commission should live up to its name and charge and not allow itself to be bamboozled or bullied by entrenched industry interests and backroom maneuvering. Please do what is right for the public interest, our children and our children's children, and the future of the globe.

William Zak
Citizens for Clean Power.
Testimony in Dover
3/6/07

Kit Zak Comment - March 23, 2007

From: Kit [mailto:kitbill@localnet.com]
Sent: Friday, March 23, 2007 4:04 PM
To: Nickerson Karen J (DOS)
Subject: Fw: Please select a future energy source rather than allow the lobbyists to sway the legislature

-

>
> PLEASE COPY THIS MESSAGE AND SHARE WITH ALL THE COMMISSIONERS: Also,
> please include the
> attachment.
>
> PLEASE SELECT A FUTURE ENERGY SOURCE RATHER THAN ALLOW THE LOBBYISTS
> TO
> SWAY THE LEGISLATURE.
>
> THE UNKNOWN, YET INEVITABLE, CARBON TAX WILL MAKE BOTH COAL AND
> NATURAL
> GAS MORE EXPENSIVE FOR RATE PAYERS OVER TIME AS WELL AS CONTRIBUTE TO
> GLOBAL
> WARMING AND OCEAN ACIDIFICATION.
>
> CURRENTLY, NRG IS IN COURT TO WEAKEN THE DNREC-MANDATED CLEAN-UP EVEN
> AS
> THEY TOUT THEIR CLEANER COAL. FOR TOO LONG THE CITIENS HAVE PAID
> UNCOUNTED
> HEALTH COSTS WHILE THE LEGISLATURE HAS REFUSED TO ACT IN OUR BEST
> INTERESTS.
>
> ONLY WIND POWER CAN BRING DOWN THE FUTURE COST OF ENERGY WHEREAS
> NATURAL
> GAS
> WILL SPIKE AND HAS PRICE VOLATILITY AS WELL AS PRODUCING GREEN HOUSE
> GASES.
>
> EVEN IF YOU MUST CHOOSE NATURAL GAS OVER WIND, PLEASE DO NOT GIVE US
> 2
> COAL
> PLANTS IN MILLSBORO.
>
> Kit Zak
> 7 Deerfiled Dr.
> Lewes, DE 19958